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4 Las Vegas, Nevada 89117
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8 Attorney for Debtor

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

TRACY LEE HURST-CASTL,

Debtor.

Case No.: 23-10410-mkn

Chapter 11
Sub Chapter V

Hearing Date: TBD
Hearing Time: TBD

EXHIBITS TO DECLARATION OF TRACY LEE HURST-CASTL IN SUPPORT
OF OBJECTION TO PROOF OF CLAIMS NO. 6 (Law Offices of Kristina
Wildeveld & Associates)
FILING FALSE CLAIM PURSUANT TO 18 U.S.C. § 152 (3) AND (4)

COMES NOW, the Debtor TRACY LEE HURST-CASTL, by and through her
attorney, Steven L. Yarmy, Esq., and hereby files her Declaration in OBJECTION TO
PROOF OF CLAIMS NO. 6 Law Offices of Kristina Wildeveld & Associates. The
Declaration of Debtor TRACY LEE HURST-CASTL is attached hereto as **EXHIBIT "1."**

Dated this 15th day of July 2023.

/s/Steven L. Yarmy, Esq.
Steven L. Yarmy, Esq.
Nevada Bar No. 8733
7464 West Sahara Avenue
Las Vegas, Nevada 89117
(702) 586-3513
(702) 586-3690 FAX
sly@stevenyarmylaw.com
Attorney for Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY under penalty of perjury that true and correct copies of the foregoing EXHIBITS TO DECLARATION OF TRACY LEE HURST-CASTL IN SUPPORT OF OBJECTION TO PROOF OF CLAIMS NO. 6 (Law Offices of Kristina Wildeveld & Associates) FILING FALSE CLAIM PURSUANT TO 18 U.S.C. § 152 (3) AND (4) were delivered via CM/ECF, and properly addressed to the following: CM/ECF system to:

MICHAEL W. CHEN on behalf of Creditor DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR REGISTERED HOLDERS OF LONG BEACH MORTGAGE LOAN TRUST 2006-6, ASSET-BACKED CERTIFICATES, SERIES 2006-6
bknotice@mccarthyholthus.com,
mchen@ecf.courtdrive.com;nvbkcourt@mccarthyholthus.com;mchen@mccarthyholthus.com

LISA A RASMUSSEN on behalf of Creditor THE LAW OFFICES OF KRISTINA WILDEVELD & ASSOCIATES
Lisa@veldlaw.com, alex@veldlaw.com

BRIAN D. SHAPIRO
brian@trusteeshapiro.com,
nv22@ecfcbis.com;kristin@trusteeshapiro.com;carolyn@brianshapirolaw.com

U.S. TRUSTEE - LV - 11
USTPRegion17.lv.ecf@usdoj.gov

JUSTIN CHARLES VALENCIA on behalf of U.S. Trustee U.S. TRUSTEE - LV - 11
justin.c.valencia@usdoj.gov

SHADD A. WADE on behalf of Creditor FCI LENDER SERVICES, INC. DBA FCI
swade@zbslaw.com, shunsaker@zbslaw.com,nvbankruptcy@zbslaw.com

/s/ Steven L. Yarmy, Esq.

Steven L. Yarmy, Esq.
Nevada Bar No. 8733
7464 West Sahara Avenue
Las Vegas, Nevada 89117

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EXHIBIT “1”
(EXHIBITS TO DECLARATION OF
TRACY LEE HURST-CASTL IN
SUPPORT OF OBJECTION TO PROOF
OF CLAIMS NO. 6 (Law Offices of
Kristina Wildeveld & Associates)
FILING FALSE CLAIM PURSUANT TO
18 U.S.C. § 152 (3) AND (4))

EXHIBIT “1”

EXHIBIT A

EMAIL CORRESPONDENCE

Dated: April 20, 2020

RE: Payment paid in full today:)

Lisa Rasmussen <Lisa@veldlaw.com>

Mon 4/20/2020 4:11 PM

To: TRACY HURST <tlhangel@hotmail.com>; kristina@veldlaw.com <kristina@veldlaw.com>

Tracy,

It was wonderful meeting Johnnie, he is adorable.

Yes, we had a break in and CSI was here!

We are fine. I'm prepping for tomorrow's hearing.

Lisa

Lisa Rasmussen, Esq.

Law Offices of Kristina Wildeveld & Associates

550 E. Charleston Blvd.

Las Vegas, NV 89101

T. (702) 222-0007 | F. (702) 222-0001

Sent from for Windows 10

From:

Sent: Monday, April 20, 2020 3:46 PM

To:

Cc:

Subject: Payment paid in full today:)

Hi Kristine,

Johnnie informed me that he came in and paid you the full amount I promised. I'm so thankful he took care of my obligation to you. I'm big on keeping my word and he knows this. Although I have been disheartened by "family" I'm grateful he was able to make sure you were paid. Big relief for me.

He told me that you had some vandalism at your office, I'm sorry that sucks. I hope nobody got hurt.

Stay safe and well...this all shall pass, I pray so very soon as many are suffering!

Thank you again for yours and Lisa's help and concern for my wellbeing. Like I said prior I will never forget your kindness. True human Angel.

Sincerely,

Tracy

Sent from my iPhone

EXHIBIT B

EMAIL CORRESPONDENCE


Dated: September 1, 2020

Documents filed today

Lisa Rasmussen <Lisa@veldlaw.com>

Tue 9/1/2020 7:14 PM

To: TRACY HURST <tlhangel@hotmail.com>

 3 attachments (4 MB)

Mtn to Continue with Exhibits.pdf; Pretrial Memo Final.pdf; Defendant's Pretrial Memo.pdf;

Hi Tracy,

I did get the documents from Johnnie, I went through some, but not all.

I filed these two things today:

1. Motion to Continue Trial;
2. Plaintiff's pretrial memorandum.

Also attached is the Defendant's pretrial memorandum.

Lisa

Lisa Rasmussen, Esq.
Law Offices of Kristina Wildeveld & Associates
550 E. Charleston Blvd.
Las Vegas, NV 89101
T. (702) 222-0007 | F. (702) 222-0001
www.veldlaw.com

Sent from Mail for Windows 10

EXHIBIT C

EMAIL CORRESPONDENCE

Dated: May 5, 2020

Castl v. PennyMac

Lisa Rasmussen <Lisa@veldlaw.com>

Tue 5/5/2020 8:56 AM

To: TRACY HURST <tlhangel@hotmail.com>; kristina@veldlaw.com
<kristina@veldlaw.com>; jessica@veldlaw.com <jessica@veldlaw.com>; michelle@veldlaw.com
<michelle@veldlaw.com>

Good morning folks:

New Trial Date is September 8, 2020.

Calendar Call is 8/19/20 at 8:30 a.m.

Pretrial Submissions due May 26, 2020 (to PennyMac)

Pretrial memorandum to be submitted on or before August 19, 2020 (to chambers)

If there is a medical issue that causes us to not be able to comply with the September 8th trial date, we must file something 60 days in Advance, which would be by July 8th.

Judge Johnson would like to see Tracy pursue local options for the follow up surgery, he does not know why she needs to travel to Florida. Just passing along what he said.

So, we can breathe for a moment.

Lisa

Lisa Rasmussen, Esq.

Law Offices of Kristina Wildeveld & Associates

550 E. Charleston Blvd.

Las Vegas, NV 89101

T. (702) 222-0007 | F. (702) 222-0001

www.veldlaw.com

Sent from Mail for Windows 10

EXHIBIT D

EMAIL CORRESPONDENCE

Dated: July 6, 2020

Re: Medical Update

Lisa Rasmussen <lisa@veldlaw.com>

Mon 7/6/2020 9:33 AM

To: TRACY HURST <tlhangel@hotmail.com>

I'm not sure what to tell the court, maybe request an extension of this deadline?

What is going on with Ken Sigelman? Johnny was contacting him directly.

Get [Outlook for iOS](#)

On Mon, Jul 6, 2020 at 8:08 AM -0700, "TRACY HURST" <tlhangel@hotmail.com> wrote:

Good morning,

Hope you had a fun 4th! I'm still in a predicament with finding a Medical Team; I'm still waiting on a consult with UCLA.

I was worried about the July 8th deadline for a motion if not medically able to participate with trial in September keeping in compliance with the Judge. At this point I have not a clue as to my ability to testify on that date this all depends on the date of the upcoming surgery. I've been literally stuck in this position with zero ability to predict what my capability will be by then.

As you know Florida is out of the question even if I could go there; their Covid situation has worsened and California seems to be just as bad.

Your aware of my insurance situation that they will only cover California in network providers. Very frustrating to say the least as this goes on my mental state is and has been very fragile.

Im hoping I will be able to finally get a teleconference consult this week, they've been waiting on a copy of my prior scans before they can schedule, this has been a lengthy process.

Let me know how we need to apprise the court on my medical status.

Thank you Lisa.

Tracy

Sent from my iPhone

EXHIBIT E

EMAIL CORRESPONDENCE

Dated: July 8, 2020

Re: Medical Update

TRACY HURST

Wed 7/8/2020 12:06 PM

To: Lisa Rasmussen <Lisa@veldlaw.com>

Hi Lisa,

Sorry for this delayed response. Yes I think it's best we ask for an extension at this point. We don't really have a choice.

Johnnie did have a conversation with Ken he said he would take another look at it but needs additional medical records from Cedars which has been requested. He seems to have statute of limitation questions/possible issue. Additionally, Johnnie has a close friend in California that referred him to an alternative firm on case Ken doesn't work out, he will be reaching out to them as well. I will make sure he keeps you updated.

Because of my current medical condition I've given Johnnie a POA to handle my business affairs and legal matters on my behalf for now. I'm very fragile emotionally and physically unable to deal with these issues it has become very overwhelming for me. Most important that I concentrate on my healing and my sanity while trying to find the appropriate Medical Team to finish my procedure so I can move on with my life.

On the Mtn house case a while back I emailed you as I prepared a complaint to submit to the Mortgage Fraud Division referencing JP Morgan Chase, PennyMac & Rushmore I didn't want him to submit it without knowing if you approve of such. Please let me know your thought on this?

Thank you for all your care and efforts on my behalf.

Be safe and stay well!

Tracy

Sent from my iPhone

On Jul 6, 2020, at 9:33 AM, Lisa Rasmussen <Lisa@veldlaw.com> wrote:

I'm not sure what to tell the court, maybe request an extension of this deadline?

What is going on with Ken Sigelman? Johnny was contacting him directly.

Get [Outlook for iOS](#)

EXHIBIT F

EMAIL CORRESPONDENCE

Dated: October 26, 2020

Documents you requested

① You forwarded this message on Wed 2/2/2022 4:14 PM

LR Lisa Rasmussen <Lisa@veldl
Mon 10/26/2020 4:52 PM
To: You



Revised Sept 29 Invoice.pdf
544 KB



Hurst Fee Agreement.pdf
114 KB

2 attachments (658 KB)

Save all to OneDrive

Download all

Hi Tracy,

I have fixed the billing entries that were listed at \$650. Those were in error, my current hourly rate is \$600. See the revised invoice attached hereto.

Also, the retainer agreement is attached hereto. It indicates that we bill hourly, which is how we do hourly cases. Our hourly rates changes at the beginning of each year so we state that it is our "current standard rates" as indicated.

And finally, I think you asked if you are going to be billed to talk to both of us tomorrow. No, we have never billed you for that when you have met with both of us and we would not do that tomorrow.

Looking forward to talking to you.

Lisa

Lisa Rasmussen, Esq.
Law Offices of Kristina Wildeveld & Associates
550 E. Charleston Blvd.
Las Vegas, NV 89101
T. (702) 222-0007 | F. (702) 222-0001
www.veldlaw.com

EXHIBIT G

BILLING INVOICES

1ST INVOICE: #196 – September 29, 2020

2ND INVOICE: #206 – October 26, 2020 (Revised)

3RD INVOICE: #234 – January 5, 2021

INVOICE NO. 196

SEPTEMBER 29, 2020

**The Law Offices of Kristina
Wildeveld & Associates**

550 E. Charleston Blvd. Suite A
Las Vegas, NV 89104
(702) 222-0007

September 29, 2020

Hurst-Castl, Tracy

Invoice Number: 196
Invoice Period: 04-09-2020 - 09-29-2020

Payment Terms: Upon Receipt

RE: Castl vs PennyMac

Time Details

Date	Professional	Description	Hours	Rate	Amount
04-09-2020	Lisa Rasmussen	Conference with client regarding representing her in this case.	0.50	600.00	300.00
04-10-2020	Lisa Rasmussen	Review docs on house case, telephone call with client.	2.00	650.00	1,300.00
04-11-2020	Lisa Rasmussen	Emails with Tracy	0.20	600.00	120.00
04-13-2020	Lisa Rasmussen	Telephone call with Tracy	0.20	600.00	120.00
04-13-2020	Lisa Rasmussen	Prepare substitution of attorney for client's signature; attempt to reach Michaelides to have him sign prior to hearing; telephone calls with Tracy.	0.80	600.00	480.00
04-14-2020	Lisa Rasmussen	Telephone calls with Tracy and Michaelides office prior to hearing.	0.40	600.00	240.00
04-14-2020	Lisa Rasmussen	Set up and attend hearing by video, call client regarding the same.	1.20	650.00	780.00
04-15-2020	Lisa Rasmussen	Emails with Michaelides office regarding Sub of Atty. (x8)	0.30	600.00	180.00
04-15-2020	Lisa Rasmussen	Emails with Tracy re: handwriting expert	0.20	600.00	120.00
04-16-2020	Lisa Rasmussen	Review documents from client and prior	2.50	600.00	1,500.00

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Page 1 of 8

Date	Professional	Description	Hours	Rate	Amount
		pleadings pulled down from the court's website.			
04-20-2020	Lisa Rasmussen	Emails with Clerk re: Bluejeans link for hearing (x3)	0.20	600.00	120.00
04-21-2020	Lisa Rasmussen	Email to Tracy after hearing	0.10	600.00	60.00
04-21-2020	Lisa Rasmussen	Prepare for and attend hearing on all prior motions.	1.20	600.00	720.00
04-22-2020	Lisa Rasmussen	Review and Revise proposed Order drafted by Pennymac; emails regarding the same (x8)	0.50	600.00	300.00
04-27-2020	Lisa Rasmussen	Prepare Motion to Continue Trial date with all exhibits; telephone call with client regarding the same.	2.80	600.00	1,680.00
04-28-2020	Lisa Rasmussen	Review clerk's notice on change of hearing date.	0.10	600.00	60.00
04-29-2020	Lisa Rasmussen	Emails with opposing counsel (x10) regarding Motion to continue and Pretrial Memorandum	0.50	600.00	300.00
04-30-2020	Lisa Rasmussen	Emails to Michaelides office seeking disclosures served, but not in file. Email to opposing counsel re: missing documents	0.30	600.00	180.00
04-30-2020	Lisa Rasmussen	Review docs sent by Pennymac (discovery docs) Download and transfer to our file (12 emails)	1.50	600.00	900.00
04-30-2020	Lisa Rasmussen	Prepare motion to continue pretrial memorandum deadline.	1.00	600.00	600.00
04-30-2020	Lisa Rasmussen	Review box from Michaelides to look for documents to prepare pretrial disclosures; email w/ opposing counsel asking them for documents; emails with Tracy.	3.20	650.00	2,080.00
05-01-2020	Lisa Rasmussen	Email to client regarding issues w/ Baggett; status.	0.30	650.00	195.00
05-01-2020	Lisa Rasmussen	Telephone call with opposing counsel re: Pretrial Memorandum; search files for missing documents.	1.80	650.00	1,170.00
05-01-2020	Lisa Rasmussen	Review opposition to motion to continue trial date.	0.40	600.00	240.00
05-01-2020	Lisa Rasmussen	Emails from clerk re: hearing and Bluejeans	0.10	600.00	60.00

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Page 2 of 8

Date	Professional	Description	Hours	Rate	Amount
		link (x3)			
05-01-2020	Lisa Rasmussen	Emails (12) with opposing counsel and Tracy re: Pretrial disclosures	0.60	600.00	360.00
05-01-2020	Lisa Rasmussen	Conference call with opposing counsel	0.50	600.00	300.00
05-02-2020	Lisa Rasmussen	Email from Tracy	0.10	600.00	60.00
05-03-2020	Lisa Rasmussen	Review filings early in case & litigation to prepare Pretrial Memorandum ; Draft Pretrial Memorandum.	3.70	650.00	2,405.00
05-04-2020	Lisa Rasmussen	Emails with opposing counsel and their draft Motion threatening sanctions.	0.30	600.00	180.00
05-04-2020	Lisa Rasmussen	10 additional emails to and from apposing counsel and Tracy regarding Baggett issue.	0.50	600.00	300.00
05-04-2020	Lisa Rasmussen	Review notice from clerk.	0.10	600.00	60.00
05-04-2020	Lisa Rasmussen	Attend hearing by video.	0.70	650.00	455.00
05-05-2020	Lisa Rasmussen	Emails with Tracy on new Trial date	0.20	600.00	120.00
05-06-2020	Lisa Rasmussen	Review documents sent by PennyMac (Disclosures by Michaelides)	0.50	650.00	325.00
05-06-2020	Lisa Rasmussen	Review clerk's notice and court order.	0.20	600.00	120.00
05-06-2020	Lisa Rasmussen	T/C with Tracy.	0.40	600.00	240.00
06-09-2020	Lisa Rasmussen	Email from Tracy	0.10	600.00	60.00
07-31-2020	Lisa Rasmussen	Email to Tracy	0.10	600.00	60.00
08-11-2020	Lisa Rasmussen	Emails to and from opposing counsel	0.20	600.00	120.00
08-13-2020	Lisa Rasmussen	Email to opposing counsel	0.10	600.00	60.00
08-17-2020	Lisa Rasmussen	Pretrial disclosure revisions; emails to Brittany	0.30	600.00	180.00
08-18-2020	Lisa Rasmussen	Emails re: Pretrial memo	0.20	600.00	120.00
08-18-2020	Lisa Rasmussen	Prepared Pretrial Memo, Pretrial Disclosures, Exhibit A, Plaintiff's Documents, Exhibit B, Defense Exhibits & List of Claims.	3.20	600.00	1,920.00

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Page 3 of 8

Date	Professional	Description	Hours	Rate	Amount
08-18-2020	Melissa Barry	Research CIV. PVO.	0.30	400.00	120.00
08-18-2020	Melissa Barry	Prepare list of claims and affirmative defenses.	1.20	400.00	480.00
08-19-2020	Lisa Rasmussen	Attend Calendar Call, status hearing.	1.00	600.00	600.00
08-20-2020	Lisa Rasmussen	Review medical Docs form client.	0.30	600.00	180.00
08-20-2020	Lisa Rasmussen	Email to opposing counsel.	0.20	600.00	120.00
08-21-2020	Lisa Rasmussen	Emails from court clerk	0.10	600.00	60.00
08-21-2020	Lisa Rasmussen	Review revisions to pretrial memo by Pennymac - accept some, reject others, send email describing issues.	0.80	600.00	480.00
08-25-2020	Lisa Rasmussen	Emails to set up test run for using Trial exhibits via video (x5)	0.20	600.00	120.00
08-26-2020	Lisa Rasmussen	Emails (x6) regarding Pretrial memo revisions.	0.30	600.00	180.00
08-26-2020	Lisa Rasmussen	Emails with counsel re: Pretrial Memorandum.	0.40	600.00	240.00
08-27-2020	Lisa Rasmussen	Prepare Pre trial Memorandum.	4.80	600.00	2,880.00
08-27-2020	Lisa Rasmussen	Emails w/ counsel re: exhibits.	1.00	600.00	600.00
08-27-2020	Lisa Rasmussen	14 emails arguing about Pretrial memo revisions.	0.60	600.00	360.00
08-31-2020	Lisa Rasmussen	Review emails from Tracy (forwarded)	0.10	600.00	60.00
08-31-2020	Lisa Rasmussen	Review defendants' pretrial memorandum.	0.20	600.00	120.00
09-01-2020	Lisa Rasmussen	Draft Motion to continue trial & prepare all exhibits, including declaration; review docs from client.	5.00	600.00	3,000.00
09-01-2020	Lisa Rasmussen	Complete Pretrial Memorandum & file; look for deposition transcripts, order transcripts.	1.40	600.00	840.00
09-01-2020	Lisa Rasmussen	Emails to clerk re: Trial exhibits	0.10	600.00	60.00
09-02-2020	Lisa Rasmussen	Fix bate stamp issue with Michaelides docs	0.30	600.00	180.00
09-02-2020	Lisa Rasmussen	Email exhibits (ours) and exhibit sheet to court clerk for Trial	0.30	600.00	180.00

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Page 4 of 8

Date	Professional	Description	Hours	Rate	Amount
09-02-2020	Lisa Rasmussen	Attend Status Check Hearing via video.	1.70	600.00	1,020.00
09-02-2020	Lisa Rasmussen	Review clerk's notice.	0.10	600.00	60.00
09-02-2020	Lisa Rasmussen	Review opposition to Motion to Continue Trial.	0.20	600.00	120.00
09-02-2020	Lisa Rasmussen	Attend trial preparation conference on Blue Jeans to learn screen share system.	1.10	600.00	660.00
09-02-2020	Lisa Rasmussen	Go through defendant's exhibits with client.	1.00	600.00	600.00
09-03-2020	Lisa Rasmussen	Review documents delivered by client.	0.50	600.00	300.00
09-03-2020	Lisa Rasmussen	Prepare exhibit binders for trial, including court's copy; prepare documents needed for possible impeachment.	3.00	600.00	1,800.00
09-03-2020	Lisa Rasmussen	State Court Non Capital In Court Attend hearing on motion to continue; read opposition; T/C with Tracy	1.00	100.00	100.00
09-03-2020	Lisa Rasmussen	Attend hearing on motion to continue trial date.	0.70	600.00	420.00
09-03-2020	Lisa Rasmussen	Emails (x8) with opposing counsel re: Trial exhibits	0.30	600.00	180.00
09-04-2020	Lisa Rasmussen	Review defendant's trial brief.	0.30	600.00	180.00
09-05-2020	Lisa Rasmussen	Review emails from Tracy	0.30	600.00	180.00
09-05-2020	Lisa Rasmussen	Review Pennymac Documents and make notes based on client's comments/review to prepare for trial.	1.50	600.00	900.00
09-07-2020	Lisa Rasmussen	Prepare direct examination of client (flow of questions); and prepare for legal elements required on our claims; review Patel declaration; decide which exhibits to use for her signature/forgery issue.	3.60	600.00	2,160.00
09-07-2020	Lisa Rasmussen	Review Tracy's exhibit notes	0.20	600.00	120.00
09-08-2020	Lisa Rasmussen	Emails with opposing counsel re: request for judicial notice (x8)	0.20	600.00	120.00
09-08-2020	Lisa Rasmussen	Trial, day one, in court time.	5.00	600.00	3,000.00
09-08-2020	Lisa Rasmussen	Review request for judicial notice filed by Pennymac on 9/3 and reconcile all documents to the exhibits they already	2.80	600.00	1,680.00

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Page 5 of 8

Date	Professional	Description	Hours	Rate	Amount
		listed; create index, make list of objections, email opposing counsel regarding objections; discuss with Tracy during break.			
09-08-2020	Lisa Rasmussen	Phone call with Tracy after trial; Review additional documents to prepare for day two; discuss Patel declaration with Tracy, further discussion of the elements and limitations of our case.	1.40	600.00	840.00
09-09-2020	Lisa Rasmussen	Telephone conference with Patel.	0.80	600.00	480.00
09-09-2020	Lisa Rasmussen	Trial, day two, actual court time.	6.50	600.00	3,900.00
09-09-2020	Lisa Rasmussen	Research on federal cases from Patel's exhibits; prepare closing argument outline.	1.80	600.00	1,080.00
09-10-2020	Lisa Rasmussen	Prepare additional documents needed for today's testimony (new Exhibits).	0.50	600.00	300.00
09-10-2020	Lisa Rasmussen	Telephone call with Tracy.	0.20	600.00	120.00
09-10-2020	Lisa Rasmussen	Trial Day Three, in court time.	5.20	600.00	3,120.00
09-10-2020	Lisa Rasmussen	Prepare closing argument during lunch break.	1.10	600.00	660.00
09-10-2020	Lisa Rasmussen	Telephone conference with client after trial.	0.90	600.00	540.00
09-11-2020	Lisa Rasmussen	Emails with opposing counsel regarding proposed order.	0.30	600.00	180.00
09-11-2020	Lisa Rasmussen	State Court Non Capital Out of Court Follow up with Johnnie	0.10	100.00	10.00
09-11-2020	Lisa Rasmussen	Emails to and from Johnnie	0.10	600.00	60.00
09-25-2020	Lisa Rasmussen	Email from Brittany/to Tracy re: findings of fact and conclusion of law	0.10	600.00	60.00
Total					57,060.00

Time Summary

Professional	Hours	Amount
Lisa Rasmussen	93.90	56,460.00
Melissa Barry	1.50	600.00
Total		57,060.00

Expenses

Expense	Description	Amount
E112 - Court fees	E112 - Court fees - Filing fees April 2020	10.50

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Page 6 of 8

Expense	Description	Amount
None	Lexis - Nexis Legal Research Fees for May 2020.	84.28
E101 - Copying	E101 - Copying - May 2020	27.00
E115 - Deposition transcripts	E115 - Deposition transcripts - From Litigation Services	1,547.05
E112 - Court fees	E112 - Court fees Transcription fees during trial, split with defendant.	220.00
E101 - Copying	E101 - Copying Copying for Trial binders	218.75
E112 - Court fees	E112 - Court fees Filing fees - September 2020	7.00
None	Lexis - Nexis Legal Research Fees for September 2020 through Sept 24, 2020..	71.30
Total Expenses		2,185.88
Total for this Invoice		59,245.88

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Page 7 of 8

Client Statement of Account

As of 09-29-2020

Matter	Balance Due
Castl vs PennyMaC	52,245.88
Total Amount to Pay	52,245.88

Castl vs PennyMaC**Transactions**

Date	Transaction	Applied	Invoice	Amount
04-14-2020	Payment Received			(2,500.00)
04-20-2020	Payment Received			(2,500.00)
09-10-2020	Payment Received			(2,000.00)
09-29-2020	Invoice 196			59,245.88
			Balance	52,245.88

Open Invoices and Credits

Date	Transaction	Amount	Applied	Balance
04-14-2020	Payment	(2,500.00)		(2,500.00)
04-20-2020	Payment	(2,500.00)		(2,500.00)
09-10-2020	Payment	(2,000.00)		(2,000.00)
09-29-2020	Invoice 196	59,245.88		59,245.88
			Balance	52,245.88

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Page 8 of 8

Receipt

Invoice Number	196
Matter	Castl vs PennyMaC
Professional	Lisa Rasmussen
Expense Code	
Date	2020-05-31
Description	Lexis - Nexis Legal Research Fees for May 2020.
Amount	84.28

Account Number

1001PGEHF
LAW OFFICE OF LISA
RASMUSSEN PC

Date Range

04/07/2020 - 09/24/2020

Report Date

09/25/2020

Currency

UNITED STATES
DOLLAR

Billing data reports include estimated taxes. The official invoice includes taxes based on actual usage for usage-based services or/and default location for non-usage-based services at invoice period end.

SUMMARY BY CLIENT

CLIENT	CONTRACT USE			TRANSACTIONAL USE					
	GROSS AMOUNT	ADJUSTMENT	NET AMOUNT	TRANSACTIONAL GROSS AMOUNT	TRANSACTIONAL ADJUSTMENT	TRANSACTIONAL NET AMOUNT	TOTAL BEFORE TAX	TAX*	TOTAL CHARGES
HURST, TRACY	\$300.00	(\$215.72)	\$84.28	\$0.00	\$0.00	\$0.00	\$84.28	\$0.00	\$84.28
Total:	\$300.00	(\$215.72)	\$84.28	\$0.00	\$0.00	\$0.00	\$84.28	\$0.00	\$84.28

EXCHANGE RATE TO United States dollar

Date	Rate	From Currency	Base Currency
SEP-25-2020	1	UNITED STATES DOLLAR	UNITED STATES DOLLAR

Receipt

Invoice Number	196
Matter	Castl vs PennyMaC
Professional	Lisa Rasmussen
Expense Code	E115 - Deposition transcripts
Date	2020-08-31
Description	E115 - Deposition transcripts - From Litigation Services
Amount	1547.05

[Print](#) | [Close Window](#)

Subject: Thank you for your order.

From: CyberSource Business Center <donotreply@support.cybersource.com>

Date: Wed, Sep 02, 2020 12:01 pm

To: michelle@veldlaw.com

Litigation Services
3960 Howard Hughes Pkwy
Las Vegas, NV 89169

Receipt

Date : 09/02/2020
Order or Merchant Reference Number : 1400395 1400397
Transaction Type : Sale

Total : 1547.05 USD

Payment Information
Name : LISA RASMUSSEN
Credit Card Type : MasterCard
Credit Card Number : #####5720

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Receipt

Invoice Number	196
Matter	Castl vs PennyMaC
Professional	Lisa Rasmussen
Expense Code	E112 - Court fees
Date	2020-09-22
Description	E112 - Court fees
	Transcription fees during trial, split with defendant.
Amount	220.00

TRANSCRIBER'S BILLING INFORMATION

CASE #	A-16-742267-C				
CASE NAME:	Tracy Castl v. Pennymac Holdings LLC				
HEARING DATE:	9/8/20, 9/9/20 & 9/10/20				
DEPARTMENT #	20				
COURT RECORDER/ EXTENSION	Angie Calvillo 702-671-4436				
ORDERED BY:	Lisa A. Rasmussen, Esq.				
FIRM:	Law Offices of Kristina Wildeveld & Associates				
EMAIL:	Lisa@Veldlaw.com				
PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 Include case number on check Mailing Address: Regional Justice Center Fiscal Services Attn: Kim Ockey 200 Lewis Ave. Las Vegas, NV 89155				
BILL AMOUNT:		CDs @ \$25 each =			\$
	11	hours @ \$40 an hour recording fee =			\$440.00
		pages @	\$	per page of trans.	\$
	Total/Split two ways				\$220.00
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to:				
BILL AMOUNT:		pages @	\$	per page of trans	\$
DATE PAID:					
TRANSCRIPTS WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED					

Receipt

Invoice Number	196
Matter	Castl vs PennyMaC
Professional	Lisa Rasmussen
Expense Code	
Date	2020-09-25
Description	Lexis - Nexis Legal Research Fees for September 2020 through Sept 24, 2020..
Amount	71.30

**THE LAW OFFICES OF KRISTINA
WILDEVELD & ASSOCIATES**

550 E. Charleston Boulevard, Suite A
Las Vegas, NV 89104
(702) 222-0007

September 29, 2020

Hurst-Castl, Tracy

Invoice Number: 206

Invoice Period: 04-09-2020 - 09-29-2020

Payment Terms: Upon Receipt

RE: Castl vs PennyMac

Time Details

Date	Professional	Description	Hours	Rate	Amount
04-09-2020	Lisa Rasmussen	Conference with client regarding representing her in this case.	0.50	600.00	300.00
04-10-2020	Lisa Rasmussen	Review docs on house case, telephone call with client.	2.00	600.00	1,200.00
04-11-2020	Lisa Rasmussen	Emails with Tracy	0.20	600.00	120.00
04-13-2020	Lisa Rasmussen	Telephone call with Tracy	0.20	600.00	120.00
04-13-2020	Lisa Rasmussen	Prepare substitution of attorney for client's signature; attempt to reach Michaelides to have him sign prior to hearing; telephone calls with Tracy.	0.80	600.00	480.00
04-14-2020	Lisa Rasmussen	Telephone calls with Tracy and Michaelides office prior to hearing.	0.40	600.00	240.00
04-14-2020	Lisa Rasmussen	Set up and attend hearing by video, call client regarding the same.	1.20	600.00	720.00
04-15-2020	Lisa Rasmussen	Emails with Michaelides office regarding Sub of Atty. (x8)	0.30	600.00	180.00
04-15-2020	Lisa	Emails with Tracy re: handwriting expert	0.20	600.00	120.00

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Page 1 of 9

Date	Professional	Description	Hours	Rate	Amount
	Rasmussen				
04-16-2020	Lisa Rasmussen	Review documents from client and prior pleadings pulled down from the court's website.	2.50	600.00	1,500.00
04-20-2020	Lisa Rasmussen	Emails with Clerk re: Bluejeans link for hearing (x3)	0.20	600.00	120.00
04-21-2020	Lisa Rasmussen	Email to Tracy after hearing	0.10	600.00	60.00
04-21-2020	Lisa Rasmussen	Prepare for and attend hearing on all prior motions.	1.20	600.00	720.00
04-22-2020	Lisa Rasmussen	Review and Revise proposed Order drafted by Pennymac; emails regarding the same (x8)	0.50	600.00	300.00
04-27-2020	Lisa Rasmussen	Prepare Motion to Continue Trial date with all exhibits; telephone call with client regarding the same.	2.80	600.00	1,680.00
04-28-2020	Lisa Rasmussen	Review clerk's notice on change of hearing date.	0.10	600.00	60.00
04-29-2020	Lisa Rasmussen	Emails with opposing counsel (x10) regarding Motion to continue and Pretrial Memorandum	0.50	600.00	300.00
04-30-2020	Lisa Rasmussen	Emails to Michaelides office seeking disclosures served, but not in file. Email to opposing counsel re: missing documents	0.30	600.00	180.00
04-30-2020	Lisa Rasmussen	Review docs sent by Pennymac (discovery docs) Download and transfer to our file (12 emails)	1.50	600.00	900.00
04-30-2020	Lisa Rasmussen	Prepare motion to continue pretrial memorandum deadline.	1.00	600.00	600.00
04-30-2020	Lisa Rasmussen	Review box from Michaelides to look for documents to prepare pretrial disclosures; email w/ opposing counsel asking them for documents; emails with Tracy.	3.20	600.00	1,920.00
05-01-2020	Lisa Rasmussen	Email to client regarding issues w/ Baggett; status.	0.30	600.00	180.00
05-01-2020	Lisa Rasmussen	Telephone call with opposing counsel re: Pretrial Memorandum; search files for missing documents.	1.80	600.00	1,080.00
05-01-2020	Lisa Rasmussen	Review opposition to motion to continue trial date.	0.40	600.00	240.00

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Page 2 of 9

Date	Professional	Description	Hours	Rate	Amount
05-01-2020	Lisa Rasmussen	Emails from clerk re: hearing and Bluejeans link (x3)	0.10	600.00	60.00
05-01-2020	Lisa Rasmussen	Emails (12) with opposing counsel and Tracy re: Pretrial disclosures	0.60	600.00	360.00
05-01-2020	Lisa Rasmussen	Conference call with opposing counsel	0.50	600.00	300.00
05-02-2020	Lisa Rasmussen	Email from Tracy	0.10	600.00	60.00
05-03-2020	Lisa Rasmussen	Review filings early in case & litigation to prepare Pretrial Memorandum ; Draft Pretrial Memorandum.	3.70	600.00	2,220.00
05-04-2020	Lisa Rasmussen	Attend hearing by video.	0.70	600.00	420.00
05-04-2020	Lisa Rasmussen	Emails with opposing counsel and their draft Motion threatening sanctions.	0.30	600.00	180.00
05-04-2020	Lisa Rasmussen	10 additional emails to and from apposing counsel and Tracy regarding Baggett issue.	0.50	600.00	300.00
05-04-2020	Lisa Rasmussen	Review notice from clerk.	0.10	600.00	60.00
05-05-2020	Lisa Rasmussen	Emails with Tracy on new Trial date	0.20	600.00	120.00
05-06-2020	Lisa Rasmussen	Review clerk's notice and court order.	0.20	600.00	120.00
05-06-2020	Lisa Rasmussen	T/C with Tracy.	0.40	600.00	240.00
05-06-2020	Lisa Rasmussen	Review documents sent by PennyMac (Disclosures by Michaelides)	0.50	600.00	300.00
06-09-2020	Lisa Rasmussen	Email from Tracy	0.10	600.00	60.00
07-31-2020	Lisa Rasmussen	Email to Tracy	0.10	600.00	60.00
08-11-2020	Lisa Rasmussen	Emails to and from opposing counsel	0.20	600.00	120.00
08-13-2020	Lisa Rasmussen	Email to opposing counsel	0.10	600.00	60.00

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Page 3 of 9

Date	Professional	Description	Hours	Rate	Amount
08-17-2020	Lisa Rasmussen	Pretrial disclosure revisions; emails to Brittany	0.30	600.00	180.00
08-18-2020	Lisa Rasmussen	Emails re: Pretrial memo	0.20	600.00	120.00
08-18-2020	Lisa Rasmussen	Prepared Pretrial Memo, Pretrial Disclosures, Exhibit A, Plaintiff's Documents, Exhibit B, Defense Exhibits & List of Claims.	3.20	600.00	1,920.00
08-18-2020	Melissa Barry	Research CIV. PVO.	0.30	400.00	120.00
08-18-2020	Melissa Barry	Prepare list of claims and affirmative defenses.	1.20	400.00	480.00
08-19-2020	Lisa Rasmussen	Attend Calendar Call, status hearing.	1.00	600.00	600.00
08-20-2020	Lisa Rasmussen	Review medical Docs form client.	0.30	600.00	180.00
08-20-2020	Lisa Rasmussen	Email to opposing counsel.	0.20	600.00	120.00
08-21-2020	Lisa Rasmussen	Emails from court clerk	0.10	600.00	60.00
08-21-2020	Lisa Rasmussen	Review revisions to pretrial memo by Pennymac - accept some, reject others, send email describing issues.	0.80	600.00	480.00
08-25-2020	Lisa Rasmussen	Emails to set up test run for using Trial exhibits via video (x5)	0.20	600.00	120.00
08-26-2020	Lisa Rasmussen	Emails (x6) regarding Pretrial memo revisions.	0.30	600.00	180.00
08-26-2020	Lisa Rasmussen	Emails with counsel re: Pretrial Memorandum.	0.40	600.00	240.00
08-27-2020	Lisa Rasmussen	Prepare Pre trial Memorandum.	4.80	600.00	2,880.00
08-27-2020	Lisa Rasmussen	Emails w/ counsel re: exhibits.	1.00	600.00	600.00
08-27-2020	Lisa Rasmussen	14 emails arguing about Pretrial memo revisions.	0.60	600.00	360.00
08-31-2020	Lisa Rasmussen	Review emails from Tracy (forwarded)	0.10	600.00	60.00
08-31-2020	Lisa	Review defendants' pretrial memorandum.	0.20	600.00	120.00
		We appreciate your business and your confidence in our firm.			

Date	Professional	Description	Hours	Rate	Amount
	Rasmussen				
09-01-2020	Lisa Rasmussen	Emails to clerk re: Trial exhibits	0.10	600.00	60.00
09-01-2020	Lisa Rasmussen	Draft Motion to continue trial & prepare all exhibits, including declaration; review docs from client.	5.00	600.00	3,000.00
09-01-2020	Lisa Rasmussen	Complete Pretrial Memorandum & file; look for deposition transcripts, order transcripts.	1.40	600.00	840.00
09-02-2020	Lisa Rasmussen	Attend Status Check Hearing via video.	1.70	600.00	1,020.00
09-02-2020	Lisa Rasmussen	Attend trial preparation conference on Blue Jeans to learn screen share system.	1.10	600.00	660.00
09-02-2020	Lisa Rasmussen	Fix bate stamp issue with Michaelides docs	0.30	600.00	180.00
09-02-2020	Lisa Rasmussen	Email exhibits (ours) and exhibit sheet to court clerk for Trial	0.30	600.00	180.00
09-02-2020	Lisa Rasmussen	Review clerk's notice.	0.10	600.00	60.00
09-02-2020	Lisa Rasmussen	Review opposition to Motion to Continue Trial.	0.20	600.00	120.00
09-02-2020	Lisa Rasmussen	Go through defendant's exhibits with client.	1.00	600.00	600.00
09-03-2020	Lisa Rasmussen	Review documents delivered by client.	0.50	600.00	300.00
09-03-2020	Lisa Rasmussen	Attend hearing on motion to continue trial date.	0.70	600.00	420.00
09-03-2020	Lisa Rasmussen	Emails (x8) with opposing counsel re: Trial exhibits	0.30	600.00	180.00
09-03-2020	Lisa Rasmussen	Prepare exhibit binders for trial, including court's copy; prepare documents needed for possible impeachment.	3.00	600.00	1,800.00
09-03-2020	Lisa Rasmussen	State Court Non Capital In Court Attend hearing on motion to continue; read opposition; T/C with Tracy	1.00	100.00	100.00
09-04-2020	Lisa Rasmussen	Review defendant's trial brief.	0.30	600.00	180.00

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Page 5 of 9

Date	Professional	Description	Hours	Rate	Amount
09-05-2020	Lisa Rasmussen	Review Pennymac Documents and make notes based on client's comments/review to prepare for trial.	1.50	600.00	900.00
09-05-2020	Lisa Rasmussen	Review emails from Tracy	0.30	600.00	180.00
09-07-2020	Lisa Rasmussen	Review Tracy's exhibit notes	0.20	600.00	120.00
09-07-2020	Lisa Rasmussen	Prepare direct examination of client (flow of questions); and prepare for legal elements required on our claims; review Patel declaration; decide which exhibits to use for her signature/forgery issue.	3.60	600.00	2,160.00
09-08-2020	Lisa Rasmussen	Trial, day one, in court time.	5.00	600.00	3,000.00
09-08-2020	Lisa Rasmussen	Review request for judicial notice filed by Pennymac on 9/3 and reconcile all documents to the exhibits they already listed; create index, make list of objections, email opposing counsel regarding objections; discuss with Tracy during break.	2.80	600.00	1,680.00
09-08-2020	Lisa Rasmussen	Phone call with Tracy after trial; Review additional documents to prepare for day two; discuss Patel declaration with Tracy, further discussion of the elements and limitations of our case.	1.40	600.00	840.00
09-08-2020	Lisa Rasmussen	Emails with opposing counsel re: request for judicial notice (x8)	0.20	600.00	120.00
09-09-2020	Lisa Rasmussen	Telephone conference with Patel.	0.80	600.00	480.00
09-09-2020	Lisa Rasmussen	Trial, day two, actual court time.	6.50	600.00	3,900.00
09-09-2020	Lisa Rasmussen	Research on federal cases from Patel's exhibits; prepare closing argument outline.	1.80	600.00	1,080.00
09-10-2020	Lisa Rasmussen	Prepare additional documents needed for today's testimony (new Exhibits).	0.50	600.00	300.00
09-10-2020	Lisa Rasmussen	Telephone call with Tracy.	0.20	600.00	120.00
09-10-2020	Lisa Rasmussen	Trial Day Three, in court time.	5.20	600.00	3,120.00

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Page 6 of 9

Date	Professional	Description	Hours	Rate	Amount
09-10-2020	Lisa Rasmussen	Prepare closing argument during lunch break.	1.10	600.00	660.00
09-10-2020	Lisa Rasmussen	Telephone conference with client after trial.	0.90	600.00	540.00
09-11-2020	Lisa Rasmussen	Emails with opposing counsel regarding proposed order.	0.30	600.00	180.00
09-11-2020	Lisa Rasmussen	Emails to and from Johnnie	0.10	600.00	60.00
09-11-2020	Lisa Rasmussen	State Court Non Capital Out of Court Follow up with Johnnie	0.10	100.00	10.00
09-25-2020	Lisa Rasmussen	Email from Brittany/to Tracy re: findings of fact and conclusion of law	0.10	600.00	60.00
Total					56,390.00

Time Summary

Professional	Hours	Amount
Lisa Rasmussen	93.90	55,790.00
Melissa Barry	1.50	600.00
Total		56,390.00

Expenses

Expense	Description	Amount
E112 - Court fees	E112 - Court fees - Filing fees April 2020	10.50
None	Lexis - Nexis Legal Research Fees for May 2020.	84.28
E101 - Copying	E101 - Copying - May 2020	27.00
E115 - Deposition transcripts	E115 - Deposition transcripts - From Litigation Services	1,547.05
E112 - Court fees	E112 - Court fees Transcription fees during trial, split with defendant.	220.00
E101 - Copying	E101 - Copying Copying for Trial binders	218.75
E112 - Court fees	E112 - Court fees Filing fees - September 2020	7.00
None	Lexis - Nexis Legal Research Fees for September 2020 through Sept 24, 2020..	71.30
Total Expenses		2,185.88

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Page 7 of 9

Total for this Invoice 58,575.88

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Page 8 of 9

00040

Client Statement of Account

As of 10-26-2020

Matter	Balance Due
Castl vs PennyMaC	51,575.88
Total Amount to Pay	51,575.88

Castl vs PennyMaC**Transactions**

Date	Transaction	Applied	Invoice	Amount
04-14-2020	Payment Received			(2,500.00)
04-20-2020	Payment Received			(2,500.00)
09-10-2020	Payment Received			(2,000.00)
09-29-2020	Invoice 206			58,575.88
			Balance	51,575.88

Open Invoices and Credits

Date	Transaction	Amount	Applied	Balance
04-14-2020	Payment	(2,500.00)		(2,500.00)
04-20-2020	Payment	(2,500.00)		(2,500.00)
09-10-2020	Payment	(2,000.00)		(2,000.00)
09-29-2020	Invoice 206	58,575.88		58,575.88
			Balance	51,575.88

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Page 9 of 9

00041

Receipt

Invoice Number	206
Matter	Castl vs PennyMaC
Professional	Lisa Rasmussen
Expense Code	
Date	2020-05-31
Description	Lexis - Nexis Legal Research Fees for May 2020.
Amount	84.28

Account Number

1001PGEHF
LAW OFFICE OF LISA
RASMUSSEN PC

Date Range

04/07/2020 - 09/24/2020

Report Date

09/25/2020

Currency

UNITED STATES
DOLLAR

Billing data reports include estimated taxes. The official invoice includes taxes based on actual usage for usage-based services or/and default location for non-usage-based services at invoice period end.

SUMMARY BY CLIENT

CLIENT	CONTRACT USE			TRANSACTIONAL USE			TOTAL BEFORE TAX	TAX*	TOTAL CHARGES
	GROSS AMOUNT	ADJUSTMENT	NET AMOUNT	TRANSACTIONAL GROSS AMOUNT	TRANSACTIONAL ADJUSTMENT	TRANSACTIONAL NET AMOUNT			
HURST, TRACY	\$300.00	(\$215.72)	\$84.28	\$0.00	\$0.00	\$0.00	\$84.28	\$0.00	\$84.28
Total:	\$300.00	(\$215.72)	\$84.28	\$0.00	\$0.00	\$0.00	\$84.28	\$0.00	\$84.28

EXCHANGE RATE TO United States dollar

Date	Rate	From Currency	Base Currency
SEP-25-2020	1	UNITED STATES DOLLAR	UNITED STATES DOLLAR

Receipt

Invoice Number	206
Matter	Castl vs PennyMaC
Professional	Lisa Rasmussen
Expense Code	E115 - Deposition transcripts
Date	2020-08-31
Description	E115 - Deposition transcripts - From Litigation Services
Amount	1547.05

[Print](#) | [Close Window](#)

Subject: Thank you for your order.

From: CyberSource Business Center <donotreply@support.cybersource.com>

Date: Wed, Sep 02, 2020 12:01 pm

To: michelle@veldlaw.com

Litigation Services
3960 Howard Hughes Pkwy
Las Vegas, NV 89169

Receipt

Date : 09/02/2020

Order or Merchant Reference Number : 1400395 1400397

Transaction Type : Sale

Total : 1547.05 USD

Payment Information

Name : LISA RASMUSSEN

Credit Card Type : MasterCard

Credit Card Number : #####5720

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Receipt

Invoice Number	206
Matter	Castl vs PennyMaC
Professional	Lisa Rasmussen
Expense Code	E112 - Court fees
Date	2020-09-22
Description	E112 - Court fees
	Transcription fees during trial, split with defendant.
Amount	220.00

TRANSCRIBER'S BILLING INFORMATION

CASE #	A-16-742267-C			
CASE NAME:	Tracy Castl v. Pennymac Holdings LLC			
HEARING DATE:	9/8/20, 9/9/20 & 9/10/20			
DEPARTMENT #	20			
COURT RECORDER/ EXTENSION	Angie Calvillo 702-671-4436			
ORDERED BY:	Lisa A. Rasmussen, Esq.			
FIRM:	Law Offices of Kristina Wildeveld & Associates			
EMAIL:	Lisa@Veldlaw.com			
PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 Include case number on check Mailing Address: Regional Justice Center Fiscal Services Attn: Kim Ockey 200 Lewis Ave. Las Vegas, NV 89155			
BILL AMOUNT:		CDs @ \$25 each =		\$
	11	hours @ \$40 an hour recording fee =		\$440.00
		pages @ \$	per page of trans.	\$
	Total/Split two ways			\$220.00
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to:			
BILL AMOUNT:		pages @	\$	per page of trans \$
DATE PAID:				
TRANSCRIPTS WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED				

Receipt

Invoice Number	206
Matter	Castl vs PennyMaC
Professional	Lisa Rasmussen
Expense Code	
Date	2020-09-25
Description	Lexis - Nexis Legal Research Fees for September 2020 through Sept 24, 2020..
Amount	71.30

Account Number

1001PGEHF
LAW OFFICE OF LISA
RASMUSSEN PC

Date Range

09/01/2020 - 09/24/2020

Report Date

09/25/2020

Currency


UNITED STATES
DOLLAR

Billing data reports include estimated taxes. The official invoice includes taxes based on actual usage for usage-based services or/and default location for non-usage-based services at invoice period end.

EXPLORE BY CUSTOMER NUMBER/CLIENT/USER

Customer Number: 10000BJXD

Client: HURST

USER NAME	USER ID	CONTRACT USE			TRANSACTIONAL USE			
		GROSS AMOUNT	ADJUSTMENT	NET AMOUNT	TRANSACTIONAL NET AMOUNT	TOTAL BEFORE TAX	TAX*	TOTAL CHARGES
RASMUSSEN, LISA	 LISA THARA	\$478.00	(\$406.70)	\$71.30	\$0.00	\$71.30	\$0.00	\$71.30
Total:		\$478.00	(\$406.70)	\$71.30	\$0.00	\$71.30	\$0.00	\$71.30

EXCHANGE RATE TO United States dollar

Date	Rate	From Currency	Base Currency
SEP-25-2020	1	UNITED STATES DOLLAR	UNITED STATES DOLLAR

INVOICE NO. 234

JANUARY 5, 2021

THE LAW OFFICES OF

KRISTINA WILDEVELD ASSOCIATES*Criminal Defense, Complex Criminal and Civil Litigation, Lobbying**Appeals, Pardons, Post-Convictions, Juvenile*

Nevada

California

500 E Charleston Blvd., Suite A
 Las Vegas, NV 89104
 702-222-0007

January 05, 2021

Tracey Hurst
 Hurst-Castl, Tracy

Invoice Number: 234
 Invoice Period: 09-01-2020 - 01-05-2021

Payment Terms: Upon Receipt

RE: Castl vs PennyMac

Time Details

Date	Professional	Description	Hours	Rate	Amount
09-30-2020	Lisa Rasmussen	Reviewed Pennymac's Proposal order.	0.20	600.00	120.00
10-01-2020	Lisa Rasmussen	Meeting with Tracy and Johnnie.	1.00	600.00	600.00
10-01-2020	Lisa Rasmussen	Review order to prepare for meeting	0.20	600.00	120.00
10-02-2020	Lisa Rasmussen	Revise Pennymac's proposed order detailed comments.	3.20	600.00	1,920.00
10-02-2020	Lisa Rasmussen	Email correspondence to and from opposing counsel (x8) regarding proposed order.	0.20	600.00	120.00
10-03-2020	Lisa Rasmussen	Emails to and from opposing counsel regarding my revisions.	0.30	600.00	180.00
10-04-2020	Lisa Rasmussen	Prepare our own proposed order; research on standing issue.	4.30	600.00	2,580.00
10-05-2020	Lisa Rasmussen	Emails with opposing counsel and Tracy regarding proposed order.	0.30	600.00	180.00

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Page 1 of 5

Date	Professional	Description	Hours	Rate	Amount
10-06-2020	Lisa Rasmussen	Revisions to FFCOL per emails with Brittany Wood; email regarding same.	0.50	600.00	300.00
10-06-2020	Lisa Rasmussen	Additional revisions and emails with Brittany. Email to client.	0.30	600.00	180.00
10-06-2020	Lisa Rasmussen	Additional research on standing issue	1.00	600.00	600.00
10-07-2020	Lisa Rasmussen	Prepare our own proposed order and submit to the Court as a contested order.	0.70	600.00	420.00
10-09-2020	Lisa Rasmussen	Additional research on standing issue; there is no good case law supporting our position.	0.90	600.00	540.00
10-27-2020	Lisa Rasmussen	Meeting with Tracy requesting plan for payment of legal fees. No charge for this meeting.	0.70		No Charge
11-13-2020	Lisa Rasmussen	Email correspondence to and from Rex Gardner, asking if we can resolve; email to Tracy re same.	0.10	600.00	60.00
11-16-2020	Lisa Rasmussen	Follow up emails to Rex letting him know I conveyed his message about proposed resolution.	0.10	600.00	60.00
11-30-2020	Lisa Rasmussen	Email correspondence to and from Tracy regarding proposed resolution.	0.10	600.00	60.00
12-04-2020	Lisa Rasmussen	Review proposed findings of fact, conclusions of law and order; review notice entry of judgment.	0.20	600.00	120.00
12-04-2020	Lisa Rasmussen	Emails to Tracy with order, findings, notice of entry of judgment, advising of deadline for appeal.	0.10	600.00	60.00
12-18-2020	Lisa Rasmussen	Email from Tracy; prepare sub of attorney and email to her.	0.30	600.00	180.00
12-30-2020	Lisa Rasmussen	Email correspondence to and from Tracy regarding sub of attorney; file sub of attorney. No charge for this.	0.20		No Charge
12-30-2020	Lisa Rasmussen	Download all emails; organize and prepare electronic file on flash drive for Tracy. Courtesy no charge for this.	1.00		No Charge
			Total		8,400.00
Time Summary					
Professional			Hours	Amount	
Lisa Rasmussen			15.90	8,400.00	

We appreciate your business and your confidence in our firm.

Page 2 of 5

Professional		Hours		Amount
		Total		8,400.00
Expenses				
Expense	Description	Price	Qty	Amount
E112 - Court fees	E112 - Court fees	3.50	1	3.50
E112 - Court fees	E112 - Court fees	3.50	1	3.50
None	Pacer Quarterly Charges - 3rd Qtr. (157 pp).	15.70	1	15.70
Total Expenses				22.70
Total for this Invoice				8,422.70

We appreciate your business and your confidence in our firm.

Page 3 of 5

Client Statement of Account

As of 01-05-2021

Matter	Balance Due
Castl vs PennyMaC	59,998.58
Total Amount to Pay	59,998.58

Castl vs PennyMaC**Transactions**

Date	Transaction	Applied	Invoice	Amount
09-29-2020	Previous Balance			51,575.88
01-05-2021	Invoice 234			8,422.70
			Balance	59,998.58

Open Invoices and Credits

Date	Transaction	Amount	Applied	Balance
04-14-2020	Payment	(2,500.00)		(2,500.00)
04-20-2020	Payment	(2,500.00)		(2,500.00)
09-10-2020	Payment	(2,000.00)		(2,000.00)
09-29-2020	Invoice 206	58,575.88		58,575.88
01-05-2021	Invoice 234	8,422.70		8,422.70
			Balance	59,998.58

We appreciate your business and your confidence in our firm.

Page 4 of 5

00054

Tracey Hurst
Hurst-Castl, Tracy

January 05, 2021

The Law Offices of Kristina Wildeveld & Associates
500 E Charleston Blvd., Suite A
Las Vegas, NV 89104

Invoice Number: 234
Invoice Period: 09-01-2020 - 01-05-2021

REMITTANCE COPY

RE: Castl vs PennyMaC

Fees	8,400.00
Expenses	22.70
Total for this Invoice	8,422.70
Previous Balance	51,575.88

Matter

Castl vs PennyMaC	Balance Due
	59,998.58
Total Amount to Pay	59,998.58

Open Invoices and Credits

Date	Transaction	Matter	Amount	Applied	Balance
04-14-2020	Payment	Castl vs PennyMaC	(2,500.00)		(2,500.00)
04-20-2020	Payment	Castl vs PennyMaC	(2,500.00)		(2,500.00)
09-10-2020	Payment	Castl vs PennyMaC	(2,000.00)		(2,000.00)
09-29-2020	Invoice 206	Castl vs PennyMaC	58,575.88		58,575.88
01-05-2021	Invoice 234	Castl vs PennyMaC	8,422.70		8,422.70
				Balance	59,998.58

We appreciate your business and your confidence in our firm.

Page 5 of 5

00055

EXHIBIT H

EMAIL CORRESPONDENCE

Dated: December 18, 2020

Substitution

TRACY HURST <tlhangel@hotmail.com>

Fri 12/18/2020 8:52 AM

To: Lisa Rasmussen <Lisa@veldlaw.com>

Hi Lisa,

I'm not surprised about the order; however I understand your position.

I request that you sign and file a Substitution of Counsel to myself as I have no other choice than to proceed in Proper Person.

Additionally I request that you provide me with copies of all email communication or documents that you have pertaining to my case with Opposing Counsel, Court or any other third party.

Please advise Patty and Kristina that my resources are exhausted at this time and actively seeking a solution aside health priorities.

Thank you.

Tracy Hurst-Castl

Sent from my iPhone

Substitution of Attorney

Lisa Rasmussen <Lisa@veldlaw.com>

Fri 12/18/2020 12:02 PM

To: TRACY HURST <tlhangel@hotmail.com>; kristina@veldlaw.com
<kristina@veldlaw.com>; patty@veldlaw.com <patty@veldlaw.com>

Hi Tracy,

The substitution of attorney is attached for your signature.

I will prepare the file for you. I will provide it to you in electronic format on a flash drive and we will let you know when it is ready for pick up. Please sign and return this substitution of attorney for me.

Thank you,

Lisa

Lisa Rasmussen, Esq.
Law Offices of Kristina Wildeveld & Associates
550 E. Charleston Blvd.
Las Vegas, NV 89101
T. (702) 222-0007 | F. (702) 222-0001
www.veldlaw.com

Sent from Mail for Windows 10

Re: Substitution of Attorney

TRACY HURST <tlhangel@hotmail.com>

Fri 12/18/2020 12:50 PM

To: Lisa Rasmussen <Lisa@veldlaw.com>

Ok thank you Lisa. Please use P.O. Box 35937, Las Vegas, NV 89133.

Please include copies of all email and or other correspondence/communication either you or anyone else at your firm had referencing myself and my case.

I will sign and get it back to you for filing. Again thank you.

Tracy

Sent from my iPhone

On Dec 18, 2020, at 12:02 PM, Lisa Rasmussen <Lisa@veldlaw.com> wrote:

Hi Tracy,

The substitution of attorney is attached for your signature.

I will prepare the file for you. I will provide it to you in electronic format on a flash drive and we will let you know when it is ready for pick up. Please sign and return this substitution of attorney for me.

Thank you,

Lisa

Lisa Rasmussen, Esq.
Law Offices of Kristina Wildeveld & Associates
550 E. Charleston Blvd.
Las Vegas, NV 89101
T. (702) 222-0007 | F. (702) 222-0001
www.veldlaw.com

Sent from Mail for Windows 10

<201218 Sub of Attorney.pdf>

EXHIBIT I

EMAIL CORRESPONDENCE

Dated: December 29, 2020

Substitution of Attorney

Lisa Rasmussen <Lisa@veldlaw.com>

Tue 12/29/2020 7:00 PM

To: TRACY HURST <tlhangel@hotmail.com>; kristina@veldlaw.com <kristina@veldlaw.com>

Hi Tracy,

I still need your signature on the Substitution of Attorney, attached.

And a reminder, your deadline to file a notice of appeal is Thursday, 12/31. I would like to get the substitution of attorney filed prior to that, or tomorrow.

Lisa

Lisa Rasmussen, Esq.

Law Offices of Kristina Wildeveld & Associates

550 E. Charleston Blvd.

Las Vegas, NV 89101

T. (702) 222-0007 | F. (702) 222-0001

www.veldlaw.com

Sent from Mail for Windows 10

EXHIBIT J

EMAIL CORRESPONDENCE

Dated: December 30, 2020

Signed Substitution of Attorney 12/18/20

TRACY HURST <tlhangel@hotmail.com>

Wed 12/30/2020 7:57 AM

To: Lisa Rasmussen <Lisa@veldlaw.com>

 4 attachments (5 MB)

ATT00001.txt; ATT00002.txt; IMG_0944.jpg; IMG_0943.jpg;

Lisa,

Yes I signed and faxed to you on 12/18/20; however you did not leave me a signature line so I wrote it in and signed it under my information and faxed it to you on 12/18, see copy fax and confirmation below.

I noticed on this new document there is a signature line for me on the second page.

Please check with whoever handles your incoming faxes. Let me know. Thanks.

Substitution of Attorney

Lisa Rasmussen <Lisa@veldlaw.com>

Wed 12/30/2020 12:29 PM

To: TRACY HURST <tlhangel@hotmail.com>

Hi Tracy,

Sorry for the confusion of the sub of attorney. I must have sent you one without a signature line and did not intend to. I also did not see a fax, so thank you for emailing me the signature.

I have filed it and a file stamped copy is attached.

Do you know when you want to pick up the file? It's a flash drive, plus a box of materials. I've put all email communications on the flash drive as well, per your request.

I hope you are feeling okay.

Lisa

Lisa Rasmussen, Esq.
Law Offices of Kristina Wildeveld & Associates
550 E. Charleston Blvd.
Las Vegas, NV 89101
T. (702) 222-0007 | F. (702) 222-0001
www.veldlaw.com

Sent from Mail for Windows 10

EXHIBIT K

Segwick

Medical Malpractice Correspondence

Sr. Claims Specialists

Re: Malpractice Correspondence

Lisa Rasmussen <lisa@veldlaw.com>

Tue 5/26/2020 10:51 AM

To: TRACY HURST <tlhangel@hotmail.com>

Ok. I'll have to figure out how Ken recommends we respond.

Lisa

Get Outlook for iOS

On Tue, May 26, 2020 at 9:58 AM -0700, "TRACY HURST" <tlhangel@hotmail.com> wrote:

| Hi Lisa,
| Hope your weekend was peaceful:)

| FYI-I received this letter in the mail Re: Dr. Black & Dr Sherman response to
| the letter.



sedgwick

P.O. Box 14478
Lexington, KY 40512-4478

May 12, 2020

Ms. Tracy Hurst-Cast
28128 Pacific Coast Highway, #150
Malibu, CA 90265

P.O. Box 35937
Las Vegas, NV 89133

Re: Our Client: Keith Black, MD, Randolph Sherman, MD
Date of Loss: To be determined
Our File #: 2020687002

Dear Ms. Hurst-Cast:

Sedgwick is the third-party claims administrator for Cedars-Sinai Medical Center. ("CSMC"), Keith Black, MD and Randolph Sherman, MD. CSMC referred your 5-4-2020 letters to Sedgwick for further handling, and your claim has been assigned to me. Kindly direct all future correspondence and inquiries regarding your claim to my attention at the above-noted address. Please reference our file number on all correspondence.

Would you be so kind as to provide further details of the incident including your theories of negligence as against Drs. Black and Sherman. I can be reached at 562-492-1842. If we are unable to connect by phone, please email me at kate.locurto@sedgwick.com if you would like to set up an appointment to discuss this matter by phone.

As a routine part of our investigation, it will be necessary to secure medical and hospital records for your past and subsequent treatment. I have enclosed authorization forms for you to sign allowing us to obtain those medical and/or hospital records. Be advised that the language in the release forms is dictated by State and Federal law and cannot be changed. Please complete one form for each medical provider with whom you have treated and return the original signed forms to me as soon as possible. I will not need a medical authorization for Cedars-Sinai Medical Center.

In addition to providing medical authorizations, please advise specifically what you are claiming Drs. Black and Sherman did or failed to do that caused you injury that resulted in damages. Please be specific as to nature of injury and damages. It is your responsibility as the individual making a claim to provide the requested information and to prove your claim. You will need to be able to show that the hospital failed to meet the standard of care and in failing to meet the standard of care caused your injury. It is my responsibility to investigate allegations and documentation presented by a person making a claim and to determine if the claim has merit.

Our undertaking of this investigation into your claim should not be construed as an admission of liability, nor should this correspondence or our communications with you be construed as a waiver of, or estoppel to, any affirmative defense available to Drs. Black and Sherman, including but not limited to the Statute of Limitations.

Sincerely,

Kate LoCurto

Kate LoCurto
Sr. Professional Liability Claims Specialist
Kate.LoCurto@sedgwick.com
(562)492-1842 Direct Line
(562)492-1865 Fax

EXHIBIT L

DECLARATION IN SUPPORT OF OPPOSITION TO MOTION FOR RELEIF FROM STAY

1 Steven L. Yarmy, Esq.
2 Nevada Bar No. 8733
3 7464 West Sahara Avenue
4 Las Vegas, Nevada 89117
5 (702) 586-3513
6 (702) 586-3690 FAX
7 sly@stevenyarmylaw.com
8 Attorney for Debtor

9
10
11 UNITED STATES BANKRUPTCY COURT
12 DISTRICT OF NEVADA

13 In re:

14 TRACY LEE HURST-CASTL,
15
16 Debtor.

Case No.: 23-10410-mkn

Chapter 11
Sub Chapter V

Hearing Date: April 12, 2023
Hearing Time: 9:30 a.m.

17
18 **DECLARATION OF TRACY LEE HURST-CASTL IN SUPPORT OF**
19 **OPPOSITION TO MOTION FOR RELIEF FROM STAY**
20 **(Contempt Attorney fees and Costs ECF 22 & ECF 26)**

21 COMES NOW, the Debtor TRACY LEE HURST-CASTL, by and through her
22 attorney, Steven L. Yarmy, Esq., and hereby files her Declaration in Support of Opposition
23 to Motion for Relief from Stay. The Declaration of Debtor TRACY LEE HURST-CASTL
24 is attached hereto as **EXHIBIT "A."**

25 **Dated this 10th day of April 2023.**

26 **/s/Steven L. Yarmy, Esq.**
27 Steven L. Yarmy, Esq.
28 Nevada Bar No. 8733
7464 West Sahara Avenue
Las Vegas, Nevada 89117
(702) 586-3513
(702) 586-3690 FAX
sly@stevenyarmylaw.com
Attorney for Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent on
April 10, 2023, to the following via:

CM/ECF:

MICHAEL W. CHEN on behalf of Creditor DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, IN TRUST FOR REGISTERED HOLDERS OF LONG
BEACH MORTGAGE LOAN TRUST 2006-6, ASSET-BACKED CERTIFICATES,
SERIES 2006-6 bknotice@mccarthyholthus.com,
chen@ecf.courtdrive.com;nvbkcourt@mccarthyholthus.com;mchen@mccarthyholthus.com

LISA A RASMUSSEN on behalf of Creditor THE LAW OFFICES OF KRISTINA
WILDEVELD & ASSOCIATES
Lisa@veldlaw.com, alex@veldlaw.com

BRIAN D. SHAPIRO
brian@trusteeshapiro.com,
nv22@ecfcbis.com;kristin@trusteeshapiro.com;carolyn@brianshapirolaw.com

U.S. TRUSTEE - LV - 11
USTPRegion17.lv.ecf@usdoj.gov

JUSTIN CHARLES VALENCIA on behalf of U.S. Trustee U.S. TRUSTEE - LV - 11
justin.c.valencia@usdoj.gov

/s/ Steven L. Yarmy, Esq.

Steven L. Yarmy, Esq.
Nevada Bar No. 8733
7464 West Sahara Avenue
Las Vegas, Nevada 89117
(702) 967-0442
sly@stevenyarmylaw.com
Attorney for the Debtors

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EXHIBIT "A."
(DECLARATION OF
TRACY LEE HURST-
CASTL)

**DECLARATION OF TRACY LEE HURST-CASTL, DEBTOR IN SUPPORT
OF OBJECTION AGAINST UNSECURED CREDITOR THE LAW OFFICE
OF THE LAW OFFICES OF KRISTINA WILDEVELD & ASSOCIATES
MOTION FOR RELIEF FROM STAY, CONTEMPT, ATTORNEY FEES AND
COSTS, FEDERAL COURT PROCEEDING AGAINST DEBTOR**

I, Tracy L. Hurst-Castl, am over the age of 18 and make this declaration under penalty of perjury, and based on my personal knowledge to be true facts. I am the Debtor in this matter and make this DECLARATION IN SUPPORT OF OBJECTION AGAINST UNSECURED CREDITOR: THE LAW OFFICE OF KRISTINA WILDEVELD & ASSOCIATES "MOTION FOR RELIEF FROM STAY".

I adamantly dispute The Law Offices of Kristina Wildeveld & Associates' false allegations contained in the Motion for Lift of Stay. This motion is persisting legal abuse with nefarious allegations diverting from their deceptive and heartless misrepresentation.

Wildeveld compromised my health and cases contrary to our clear agreement; which were to initiate a medical malpractice complaint while preserving my case (Castl v Pennymac) with an open continuance during my cranial disability to expedite additional surgical options then having procedures obstructed further under pandemic restrictions. They agreed to protect my physical, emotional, and cognitive challenged condition and foremost align

themselves with California co-counsel filing a timely malpractice complaint under contingent fee within its statute of limitations.

Wildeveld was clearly aware I possessed no foreseeable financial means living on family contribution. Therefore, we agreed on a "flat fee" in the amount of \$5,000 made in two separate \$2500 payments for Castl v. Pennymac case. They deceptively altered the document adding the "\$2,000" per month to the flat fee agreement after I had signed it neglecting to provide me a copy, failing to identify scope of work, disclose hourly rate, failing to identify client and case number on their ambiguous, generic fee agreement form. The \$2000 that was delivered to their office on the last day of trial September 10, 2020 with my intent to cover their out of pocket expenses for deposition transcripts and miscellaneous court costs, then them characterizing the reimbursement as a missed payment, was dishonorable and misleading (Exhibit A).

Wildeveld framed other intention and optics coercing trial, instilling my fear of loss, after failing to notify the judge timely (60 days prior to trial date) of my medical condition status for continuance; emphasized by multiple doctors and surgeons letters cautioning the court against my participation. This was memorialized by Ms. Rasmussen email dated May 5, 2020:

"If there is a medical issue that causes us to not be able to comply with the September 8th trial date, we must file something 60 days in Advance, which would be by July 8th." (Exhibit C)

Wildeveld betrayed our agreement diverting primary objective from my medical malpractice complaint in trust of their oversight. I discovered they secretly created a separate account for the medical malpractice case, then billed me in the blind for trial charges including \$7000 for medical malpractice hour's months later after the fact. There was never a request for monthly payment or billing statements provided and no past due notices demanding payment, or accounting statements presented, for it were never part of our agreement from the onset their representation.

Wildeveld alleges FALSE CLAIMS OF BREACH OF CONTRACT, UNJUST ENRICHMENT, FRAUD, and INTENTIONAL MISREPRESENTATION, yet their actions and inaction demonstrate guilt of their own allegations at the expense of my vulnerability. These fees were insulting to injury specifically acting in bad faith only receiving a copy long after concluding the trial on September 10, 2020. I was completely blindsided by their surprised invoice that was disorienting, then I

requested a copy on October 2, 2020, belatedly 3 weeks later Ms. Rasmussen finally provided me a copy on October 26, 2020 and the Revised Invoice No. 206.

Wildeveld was grossly negligent discounting our prior agreement for the medical malpractice case, then dishonorably created unjust billable hours putting me against the wall with little device and no protection of health or case understood as mutually agreed upon retention. Additionally Ms. Rasmussen authored and sent by certified mail 90 day notices to the Cedar Sinai surgeons "Re: Potential Medical Malpractice Claim of Tracy L. Hurst" with return receipt to their office, only to completely ignore responding to time sensitive correspondence from Ms. Kate LoCurto, Sr. Professional Liability Claims Specialist representing the Cedar Sinai surgeons'. She requested further information on my claim; they lead me to believe I could trust them with having my best interest when engaging them about their gross negligence and my continued suffering. Unbeknownst to me, they neglected to respond and went silent (Exhibit D). Because they failed to communicate with Ms. LoCurto as legal professionals having knowledge and retained a complete set of my medical records they had the ability to negotiate an out of court financial settlement to possibly eliminate and avoid the need to file a medical malpractice lawsuit; despite knowing that Dr. Lauren Schwartz and Dr. Arthur Desrosiers's surgical report proves their discovery

removing foreign objects from my head, and willing to testifying to clear malpractice was grossly negligent on their part, breaching their duty of care then failed to uphold their fiduciary obligation to advocate for a most vulnerable client.

Their inaction and secrecy of ignoring crucial insurance correspondence severely damaged my ability to collect a well deserved financial settlement; they were professionally negligent not pursuing negotiations for settlement and completely failed to protect my best interest causing further loss, unnecessary suffering was a deliberate sabotage. They failed to update case progress ignoring the statute of limitations and preserve my right to redress the Cedar Sinai surgeons' gross negligence. Their actions lack conscience with such a malicious ambush lending other questions to motive than money.

Wildeveld continues to violate my Attorney-Client Privilege purposely defaming me by filing this complaint seeking erroneous legal fees using deception and false allegations. They demonstrated unethical behavior obtaining my "sealed divorce record" without my consent and long after their legal representation had ceased; publishing in the public record by their court MOTION included as an exhibit and failed to redact my social security number, personal contact information left exposed on the fee agreement as shown in numerous filed motions throughout this

case, with complete disregard of protecting my privacy and grossly violating attorney client privilege.

Furthermore, Ms. Rasmussen violated the HIPPA act failing to protect my medical privacy, disclosing publicly my entire hospital record (Good Samaritan Medical Center) and photo as an exhibit in a MOTION TO CONTINUE TRIAL DATE (Castl v. Pennymac) without my knowledge or consent. She was careless, refused to redact or seal private personal and medical information in her motion, after the fact convincing me that she had no other choice, despite having numerous surgeon and doctor letters as sufficient evidence for the court.

On March 20, 2023, I memorialized my intent to file a legal malpractice against The Firm on **"Official Form 106A/B, Schedule A/B"**:

"Property, Part 4, Malpractice claim against law firm of Weldeveld & Associates Allowed SOL on Medical Mal Proactise [sic] to expire."

California counsel who neglected to appear less informing me of Wildeveld's motions then failed to file critical oppositions to the proceedings left mostly unopposed to my detriment. On May 26, 2022 Weldeveld was awarded \$12,480. in attorney's fees and \$50.80 in costs from Tracy L. Hurst-Castl, etal, Removing Defendants by the **UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA**. Then on December 5, 2022 Wildeveld filed in the

UNITED STATES COURT DISTRICT OF NEVADA Case No. 2:22ms-00033 "NOTICE OF JUDGEMENT DEBTORS EXAM" only to further traumatize and harass me despite knowing my disabilities having no foreseeable financial means to comply with the judgment, leads me to question their true motive.

On December 29, 2022 Nevada Attorney Byron Thomas in his effort to protect my disability to unwarranted and hostile interrogation he filed an **"EX PARTE APPLICATION FOR A PROTECTIVE ORDER IN RE: DEBTOR EXAM SCHEDULED ON DECEMBER 30, 2022; CERTIFICATION OF MEET AND CONFER AND PROPOSED ORDER DEBTOR EXAM: 12-30-2022."** (Exhibit B)

On January 11, 2023 Wildeveld filed an **"OPPOSITION TO APPLICATION FOR A PROTECTIVE ORDER IN RE: DEBTOR EXAM SCHEDULED ON DECEMBER 30, 2022"** thereafter they continued to seek additional judgments filing **ORDER TO SHOW CAUSE RE CIVIL CONTEMPT APPLICATION FOR AWARD OF ADDITIONAL FEES AND COSTS POST JUDGMENT** hearing was to be held on February 6, 2023. Because of the pending court hearing, exposure and further harm I was forced to seek emergency bankruptcy protection to protect myself from The Law office of Kristina Wildeveld & Associates.

In conclusion, this motion is their latest act of a thinly veiled attack on me under bankruptcy protection. They breached their duty of care and I have been

harmd in numerous ways as a result. Therefore, I've proclaimed to the Trustees as well my counsel intention to file a legal malpractice complaint against Wildeveld for their gross negligence and other causes of action; their neglect was complicit, cloaked and unconscionable to my trauma facing peril with a clear understanding of my abilities and disability. I adamantly object to Wildeveld's false allegations, deceitful misrepresentation to the court, and their fraudulent billing tactics.

I dispute their debt and Proof of Claims filed in this bankruptcy action and will vigorously defend proving my innocence to all said allegations.

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.**

DATED this 31ST day of March, 2023

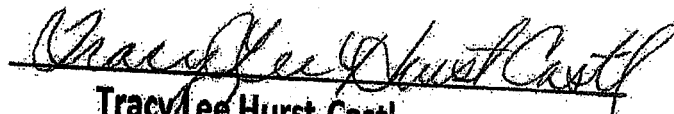

Tracy Lee Hurst-Castl

EXHIBIT "A"

Wildeveld Flat Fee Agreement

Attorney Fee Receipts

THE LAW OFFICES OF KRISTINA WILDEVELD & ASSOCIATES
www.veldlaw.com

DATE: 4/14/20

Referred By:

CLIENT INFORMATION			
First Name: Tracy	Middle Name: Lee	Last Name: Hurst-Castl	
Date of Birth: 10/18/60	SSN: 567-33-3162	ID #:	
Email: thangel@hotmail.com	Email Letters? <input checked="" type="radio"/> Y <input type="radio"/> N	Email Bills? <input checked="" type="radio"/> Y <input type="radio"/> N	
Mailing Address: P.O. Box 35987	Home Phone:		
LD NV 89133	Mobile Phone: 702 139-4464		
Other Contacts:	Work Phone:		
1. Name: Kelly Hurst	Phone: 702 682-2779	Relationship: Son	
2. Name: Johnnie Castl	Phone: 646 330-8819	Relationship: X husband	
Employer of Client:	Phone:	Monthly Salary:	\$
US Citizen? <input type="radio"/> Y <input checked="" type="radio"/> N	Place of Birth: Burkina Faso	If no, what is your status?	
COURT DATE(S):			
1 Case No.	Court	Proceeding	Date Time
2 Case No.	Court	Proceeding	Date Time
CHARGES			
1		PRIORS (if any)	Year
2			Year
3			Year

STOP: OFFICE USE ONLY

Std ofc. hourly rates Consult Fee: C DC CC MC CK:
Fees: fixed, non-refundable PLAT FEE for representation in proceedings up to and including negotiations, PH or GJ and Writ and/or denial/dismissal and is set based on the experience of the office. The fee is to be paid as follows: \$ 3000 initial retainer paid upfront; remaining balance payable at a rate of at least \$ 3000 per month commencing on the payment date indicated below. Any outstanding balance/fees owed are due no later than seven (7) days prior to PH, Trial, entry of plea, denial/dismissal of charges or whichever occurs first, regardless of any payment plan scheduled. All criminal retainers are deemed earned when received and will not be held in Trust. The Law Firm understands all funds used as payment are derived from a legal source. Unless otherwise specifically stated herein, this agreement does not include representation at Trial or obligate the Law Firm or member attorneys to prepare or file an appeal or to defend any re-filed charge(s). Proceedings not included in this agreement will incur additional attorney's fees. This fee does not include any applicable charges that may be incurred, including but not limited to restitution, fines, court fees, discovery fees, filing fees, witness fees, investigator costs, collection costs, travel fees, or any other miscellaneous fees. Client is solely responsible for all fees incurred and must pay all fees upon notice of the same. Pardons and Parole Petitions are considered the intellectual property of The Firm and are non-transferable or discoverable. The client file is the property of The Law Firm unless all of the fees are paid in full. Abuse and Neglect representation is for a 1 year period. Additional time will require an additional contract. There is a \$75.00 fee to pull closed files plus copy fees of \$0.35 per page.

AGREEMENT FOR REPRESENTATION: I HEREBY RETAIN KRISTINA WILDEVELD, ESQ. & ASSOCIATES ("Law Firm")

The Law Firm is hereby engaged to represent: (Client) in the above matter(s). Client(s) and designated Fee Co-Payer(s) agree(s) to pay the Law Firm a retainer fee as described above in exchange for the specified legal services in connection with the matter(s) indicated herein. I understand that the Law Firm may associate or employ other counsel or marketing representative at the Law Firm's discretion provided there are no additional attorney's fees to Client. I promise to pay as set forth herein and pay the fees in full. I understand that no guarantee has been made regarding the outcome of my case(s) and that any outcome will not affect attorney fees owed or any applicable fees incurred. I further agree to adhere to my billing contract/payment plan and understand that if I miss a payment, a \$50.00 fee will be applied to my balance each month until payments resume. (INIT). I also understand that if I miss a payment, that this office reserves the right to discontinue any payment plan set and demand the outstanding balance in full, payable immediately or withdraw as counsel. (INIT). I further understand that the Law Firm may move to withdraw as counsel for Client if fees are not promptly paid. (INIT). I understand a \$100.00 fee applies for any Non-Sufficient Funds check posted on my account. (INIT). I understand there is an additional \$350.00 fee charged for each additional status check. (INIT). I understand that the hourly rate is \$750.00 per hour for any fee dispute. (INIT). By signing below, I hereby agree to the representation described herein and agree to the terms of this agreement.

Client Signature: Tracy Lee Hurst-Castl

Fee Co-Payer Name/Signature:

Attorney Signature: Kristina Wildveld

Kristina Wildveld Dayvid Figler Lisa Rasmussen Caitlyn McAmis Jim Hoffman Eva Romero
550 E. Charleston Blvd., Suite A - Las Vegas, Nevada 89104
Phone: (702) 222-0007 • Fax: (702) 222-0001
contact@veldlaw.com

Bank of America: 501005739642
Routing Number: 122400724 / Wire Transfer: 026009593

Retainer: \$2,500.00
C DC CC MO CK:
Payment Dates:
1. / / Monthly
2. / /
3. / /
4. / /
5. / /
(INIT) I agree to monthly recurring credit card payments.
Copy of picture ID: Y N

Date: 4/14/2020

Date:

The Law Offices of
Kristina Wildeveid, Esq.
550 E. Charleston Blvd., Suite A
Las Vegas, NV 89104

date 4 / 20 / 20 No. 071289
received from Johnnie Castt. 40 Tracy Castt \$ 2500.00
amount two thousand five hundred 00/100 dollars
for payment of Attorney fee
☒ cash ☐ money order ☐ credit card ☐ check # _____
amount due _____
amount paid 2500 00 from _____ to _____
balance _____ signature [Signature]
SWS

The Law Offices of
Kristina Wildeveid, Esq.
550 E. Charleston Blvd., Suite A
Las Vegas, NV 89104

date 4 / 14 / 20 No. 071282
received from Tracy Harvest - Castt \$ 2500.00
amount two thousand five hundred 00/100 dollars
for payment of Attorney fee
☒ cash ☐ money order ☐ credit card ☐ check # _____
amount due _____
amount paid 2500 00 from _____ to _____
balance _____ signature [Signature]
SWS

EXHIBIT "B"

Tracy L. Hurst-Castl

Declaration

Protective Order Re: Debtor Exam

**DECLARATION OF TRACY L. HURST-CASTI
IN SUPPORT OF OPPOSITION TO APPLICATION FOR A PROTECTIVE ORDER IN RE:
DEBTOR EXAM SCHEDULED ON DECEMBER 30, 2022**

I, Tracy L. Hurst-Casti, am over the age of 18 and make this declaration under penalty of perjury, and based on my personal knowledge to be true facts. My friend prepared this declaration after researching case filings, emails, and letters.

I am the Defendant in this matter and make this DECLARATION IN SUPPORT OF OPPOSITION TO APPLICATION FOR A PROTECTIVE ORDER IN RE: DEBTOR EXAM SCHEDULED ON DECEMBER 30, 2022, for good cause.

"SERIOUS COMPLICATIONS FROM FOUR (4) BRAIN SURGERIES AND THE RESULTING PHYSICAL AND PSYCHOLOGICAL TRAUMA," Dr. Laura Schwartz (See attached photo)

I initially went to Cedar-Sinai Medical Center to have a brain tumor removed. Due to the complications of a chronic infection, I had two additional emergency exploratory surgeries at Cedar-Sinai. I underwent a third emergency surgery due to the infection that advanced into life-threatening sepsis, and proceeded to spread infecting my bone/skull. Dr. Lauren Schwartz and Dr. Arthur Desrosiers made a diagnosis of severe osteomyelitis, a rare bone infection. They performed emergency surgery and found and removed a screw and sponge left in

my head from the prior emergency surgeries. The neurosurgeons also removed a portion of my skull that was dead, which left my head and forehead visually deformed. Having no protection to my brain, I am currently suffering from pain, panic attacks and migraine headaches, in addition to having an open wound stemming from gross negligence of the Cedar-Sinai neurosurgeons.

THE WILDEVELD LAW OFFICE

When I was referred to Attorney Kristina Wildeveld I was still under the care of the Neurosurgeons Dr. Lauren Schwartz and Dr. Arthur Desrosiers. In this case the Attorneys took advantage of my vulnerable state and prolonged my suffering undermining and violating my right to due process. I have suffered consistent irreparable emotional and financial harm from the attorneys.

During my initial consultation with Attorneys Wildeveld and Rasmussen, told me they were licensed in California. The main topic we discussed was my request to file a medical malpractice complaint against Cedar-Sinai's surgeons' gross negligence, the complaint needed to be filed in California, and they would be working with their co-counsel "Josh" in their Los Angeles office. I signed a medical record release form authorizing them to acquire additional Cedar Sinai medical records; I also provided them the medical report from my most recent hospital stay. Attorney Wildeveld told me that she would not charge fees for the

consultation, and that she would represent me in the medical malpractice case under a contingency fee arrangement, subsequently Attorney Rasmussen stated she created a separate account for the medical malpractice case. Ultimately, they failed to file the medical malpractice lawsuit which has caused me further harm, particularly knowing my vulnerable state.

I fully disclosed my financial condition, being unemployed since my car accident August 4, 2018 and the discovery of the brain tumor September 2018, subsequently undergoing the three emergency surgeries.

Judge Ron Johnson stated that if I was experiencing medical issues that caused me not to be able to comply with the September 8th trial date, that Attorney Rasmussen was requested to notify the judge to extend the trial date, 60 days in advance, which would be by July 8th.

On July 6, 2020, I emailed Attorney Rasmussen that I was having difficulty with my insurance company denial of coverage for Dr. Schwartz payment to complete my surgeries while under her testament to persisting mental/emotional duress could complicate and compromise a healthy prognosis. I asked Attorney Rasmussen how we're going to notify the court about my medical status. She replied that she wasn't sure what to tell the court and answered my question with a question, "Maybe request an extension of this deadline?" I responded, "Yes, I

think its best we ask for an extension at this point. We really don't have a choice." She failed to update the court. On September 1, 2020, just days before the trial, she filed a pre-trial memorandum and an untimely motion for a continuance which the Court denied.

Attorney Rasmussen's recent filing of "APPLICATION FOR AWARD OF ADDITIONAL FEES AND COSTS POST JUDGMENT" to be heard on February 6, 2023 requesting an additional \$11,476.51 inflated to \$24,007.31 equally unjustified.

Thereafter, Attorney Applbaum failed to file an objection to the remand, or file an objection or appear at crucial hearings for the Nevada attorney fees in the amount of \$12,530.80 that resulted in a judgment; he likewise failed to inform me the court issued a judgment, ordering me to make payment within 30 days.

I first learned about the judgment when informed by a Bank of America customer service representative on November 10, 2022 that Attorney Rasmussen, in an attempt to collect fees levied my brain injured brother's personal California Bank of America accounts, where he receives Federal SSDI income. My name has been attached to his accounts for a long time assisting him with his financial affairs.

CALIFORNIA-NEVADA RESIDENCY

My brother was in a motorcycle accident and suffered a traumatic brain injury in 1989; the doctor's diagnosed cognitive developmental and physical disabilities for life after the trauma. He can't live alone or without direction or supervision. My older brother and I take turns supervising his care; for many years I've commuted back and forth between Nevada and California maintaining a dual residency.

UNDER MARC APPLBAUM'S ADVICE (CALIFORNIA), I DID NOT HAVE A GOOD UNDERSTANDING OF THE CASE GIVEN MY OWN SEVERE VULNERABILITIES

Upon consulting with Marc Applbaum, he'd expressed he could represent me under Rule 42 associating with an attorney from Nevada, as I'd had many obstacles obtaining such due to conflicts of interest being the local attorneys have personal relationships with one another.

Thereafter, Marc Applbaum's inability to find a Nevada associate and at the risk of receiving a default, at the 12th hour, he filed a Motion to Remove. In his motion he stated "Defendants are domiciled in California," (p 2/1 22) and that was based on my dual residency in both states. As a consequence of his failure to file an objection to their motion, the court ordered additional fees to Attorney Rasmussen. Belatedly I discovered that I had lost, having to pay additional fees to

Attorney Rasmussen adding more than a little insult to injury. Thereafter, Attorney Applbaum avoided communicating with me which took a devastating toll on my physical and mental health.

COVID CRISIS

In response to the Covid crisis, the Nevada courts stopped litigants and attorneys from holding non-essential civil trials that affected my case and restricting my ability to help my lawyers in preparing my case. Covid has caused severe delays and numerous medical cancellations having a negative impact on my medical care and mental health.

In reference to the challenges, during Covid there were out of the ordinary restrictions having interruption in performing operations and the abnormal daily business within the hospital system additionally having to comply with the Governors state of emergency orders collectively compounded and stalled my efforts to complete my needed surgical procedures, in addition to being confined to in-network California surgical teams.

DR. LAUREN SCHWARTZ, MD, FAANS, FACS
Adult and Pediatric Neurosurgery
West Palm Beach, FL

To date, I am currently under Dr. Schwartz's care, who saved my life. She has requested that I seek psychological care, and has provided numerous letters to Attorneys Wildeveld and Rasmussen and the court before and after they filed this complaint.

The legal abuse that I have suffered from various attorneys who have failed to adequately defend me or to effectively fight for my rights has affected my mental, emotional and medical stability prolonging my suffering. I have been traumatized over and over again and assaulted by my many attorneys' ethical violations, betrayals and fraud. The attorneys have undermined my vulnerabilities having a devastating toll on my physical and mental health. *(See attached letters for confirmation of legitimate reasons for my inability to attend the debtor's exam: Cedar Sinai, October 24, 2018, November 28, 2018; June 11, 2019; November 23, 2019, Dr. Schwartz; February 19, 2020, letter addressed to Attorney Thomas Michaelidis from Neurological Surgery of Palm Beach; March 13, 2020, Dr. Schwartz; August 20, 2020, Dr. Richard Teh; August 24, 2020, Dr. Arthur Desrosiers; May 5, 2022, Dr. Schwartz, which states:*

On May 5, 2022, Lauren Schwartz, MD emailed the following letter to Attorney Byron Thomas and Attorney Applbaum regarding my serious complications from four (4) brain surgeries and the resulting physical and psychological trauma:

Ms. Hurst has been under my continual neurosurgical care since her most recent of four cranial procedures 11/15/19 to present, related to the initial surgery for resection of a brain tumor. Ms. Hurst requires additional corrective surgery for treatment of a resistant post-operative wound infection. This forthcoming surgery is the final part of the treatment strategy to address this serious infection at the surgical site which has caused tissue loss and osseous deformity. Ms. Hurst was treated by our craniofacial team in West Palm Beach, where we laid the groundwork for the next stage of surgery for her hopeful complete functional recovery. Due to travel restrictions from the pandemic along with the patient's medical insurance limitations, she is unable to come to West Palm Beach for further treatment. Progress was also delayed locally due to surgery scheduling limitations caused by the unforeseen pandemic, and at this time she is in the preparative stage for her next surgery. In addition to Ms. Hurst's extreme emotional duress from her condition and in facing this next stage of surgery for skull and craniofacial reconstruction, she also requires medication that I do not feel will make her a reliable witness or allow her to fully participate in a reasonable capacity for any legal or even mildly complex business interactions. Based on the current surgical plan and schedule, I would anticipate her condition will be limited to the next (3) months. At that time she should then be able to proceed with full mental and emotional capacity, barring any unforeseeable complications. Feel free to contact me should there be any additional questions.

DR. DESROSIERS, III M.D. FACS

I provided Attorney Rasmussen a letter, dated August 24, 2020, from Dr. Desrosiers who outlined the multiple challenges that I endured: the impact of Covid restrictions on my care, difficulty with finding a surgical team under my insurance plan's network, and the insurance company declining continuity-of-medical care to perform surgery.

My situation is complex, he references all the complications due to unforeseen circumstances with my medical status and the interference of the Covid, including the fact that the insurance company failed to grant his office continuity-of-care authorization to perform my surgery.

In collaboration with Dr. Lauren Schwartz, they both worked with me to help identify California surgeons that my insurance plan would cover and to identify other suitable in-network surgical teams. In good faith, I have made multiple efforts to have numerous consultations with other in-network surgical teams.

DR. RICHARD TEH, MD

I provided Attorney Rasmussen a letter from Dr. Teh, my primary care doctor, who was overseeing my care and consulting with me during the covid

shutdown; he monitored my symptoms and the ongoing infection at the wound site, and periodically ordered blood tests and labs while stalled in this condition.

DEBTOR'S EXAM

Attorneys Wildeveld's and Rasmussen's motion requesting a debtor's exam is solely meant to intentionally harass and to deliberately cause further harm from the legal abuse I have suffered during this court process which prevents me from appearing in court and from advocating on my own behalf.

I am unable to attend the debtor's examination due to extreme anxiety, panic attacks, throbbing from the wound site where I'm missing part of my skull, and experiencing debilitating migraine headaches when under severe duress. I am unable to attend the debtor's examination until I can be seen by a neuropsychologist to help me overcome my fears of the legal abuse I have endured for over several years, since my attorney Jacob Hafter committed suicide, which has caused severe psychological, emotional, and financial harm. I have been forced by my many attorneys' negligence to hire attorney after attorney and incur unnecessary legal expenses which has created an atmosphere of a never-ending lawsuit since his death. The legal system failed to uphold my attorney's responsibilities to provide a fair venue for justice.

DR. KATRINA HARRIS, Ph.D., CPC-INTERN

I have been under the care of Dr. Harris undergoing therapy sessions on a weekly basis; she did not attend the evidentiary hearing because she told me that she is not credentialed to perform the specific neuropsychological evaluation that I need. I have an extraordinary circumstance with difficult medical and mental challenges to overcome the trauma that I have suffered before going forward with the additional two surgeries prescribed.

Dr. Harris has emailed Attorney Byron Thomas on several occasions informing him that she is overseeing my mental health and is actively helping me in finding a neuropsychologist who is approved within my insurance network to perform the in-depth evaluation that Dr. Schwartz prescribed.

CONCLUSION

Despite the knowledge that I am currently suffering from pain and extreme anxiety and trauma, resulting from the gross negligence of the neurosurgeons, **"serious complications from four (4) brain surgeries and the resulting physical and psychological trauma,"** Attorney's Wildeveld and Rasmussen's purpose in filing this debtor's examination and complaint is solely meant to intentionally harass and to deliberately cause further harm from the legal abuse I have suffered

during this court process having to take anxiety medication which prevents me from appearing in court and from advocating on my own behalf.

For good cause, I respectfully request this court to allow the credentialed neuropsychologist to perform an in-depth psychological evaluation. I have a confirmed scheduled appointment for a consultation with the neuropsychologist on February 15, 2023.

With the doctor's help, she will be able to provide treatment for my anxiety, depression, and fear of undergoing surgery in addition to the long-standing effects of legal abuse I have suffered by my many attorneys in misusing the court system against my interests.

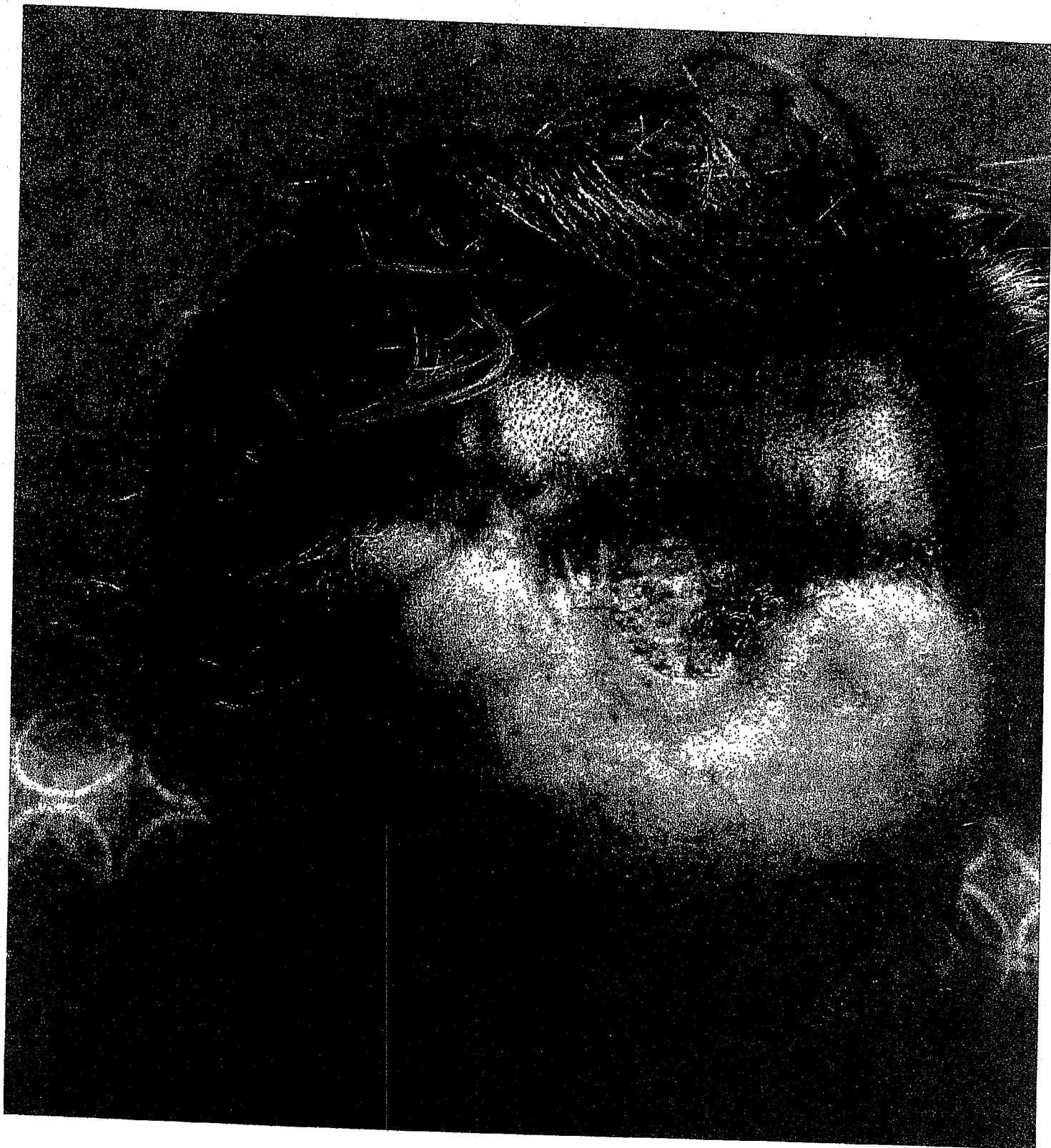
Finally, with the help of my neuropsychologist, I would be willing to appear at a debtor's examination in a zoom meeting from the confines of my home.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATED this 24th day of JANUARY, 2023.


Tracy L. Hurst-Castl

TRACY HURST PHOTO



**DR. KEITH L. BLACK,
M.D.**



CEDARS-SINAI

October 24, 2018

Re: Ms. Tracy Lee Hurstcastl
Date of Birth: October 18, 1960

To Whom It May Concern:

Ms. Tracy Lee Hurstcastl is under my care at Cedars-Sinai Medical Center - Department of Neurosurgery. Ms. Hurstcastl was seen on October 8, 2018 in our outpatient clinic and is scheduled for brain tumor surgery with Dr. Keith Black on November 15, 2018. Patients recovering from brain tumor surgery usually requires 4-6 weeks recuperation time.

Please feel free to call our office at 310-423-7900 if you have any questions.

Sincerely,

Suzanne Brian, PAC
Senior Physician Assistant



CEDARS-SINAI

Keith L. Black, MD
Professor and Chair, Department of Neurosurgery
Director, Maxine Dunitz Neurosurgical Institute
Director, Johnnie L. Cochran, Jr. Brain Tumor Center
Ruth and Lawrence Harvey Chair in Neuroscience

November 28, 2018

Re: Tracy Lee Hurstcastl
Date of Birth: 10/18/1980

To Whom It May Concern:

Ms. Tracy Lee Hurstcastl is under my care at Cedars-Sinai Department of Neurosurgery. Ms. Hurstcastl was seen on October 8, 2018 for a neurosurgical consultation and underwent brain surgery on November 15, 2018. She is doing well after surgery and can resume driving.

Sincerely,


Keith L. Black, MD

Department of Neurosurgery
227 S. San Vicente Blvd, Suite A6600
Los Angeles, California 90048
sina.edu/neurosurgery

office 310.423.7900
fax 310.423.1008

casinabt@csns.org
cedars-

DR. RAY CHU



CEDARS-SINAI.

June 11, 2019

Re: Hurstcasti, Tracy
DOB: 10/18/60
MRN: 201812124

To Whom It May Concern:

Please be advised that Ms. Tracy Hurstcasti has been a patient of the Department of Neurosurgery at Cedars-Sinai since 10/8/18 for evaluation and management of a meningioma. On 11/15/18, she underwent a bifrontal craniotomy for tumor resection. This was complicated by a delayed infection and difficulties with healing, and she subsequently underwent a bifrontal wound exploration and revision on 3/29/19. She was placed on long term antibiotics following this for several weeks.

She was last seen in our office on 6/5/19, and her wound did not appear fully healed. We are anticipating she will require additional surgery in the near future for revision of her wound.

Ms. Hurstcasti is unable to participate in her on-going legal case secondary to her continued medical care. Please take these factors into consideration. Please contact our office with any additional questions or concerns.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ray Chu'.

Ray Chu, MD

**DR. LAUREN
SCHWARTZ**

Neurological Surgery of Palm Beach

1001 N. Palm Beach Blvd., Suite 2500
West Palm Beach, Florida 33411
Tel: 561.833.2244

TCM Law Group
2620 Regatta Drive
Las Vegas, NV 89128

November 23, 2019

Re: Ms. Tracy Hurst-Castl

TO WHOM IT MAY CONCERN:

Ms. Tracy Hurst-Castl is under my care after being admitted on an emergency basis to my hospital and undergoing emergent surgery which appears to be related to a prior surgical procedure. Once discharged from the hospital, due to the complexity of her medical issues, need for medications and ongoing medical treatment, she is not able to participate in any matter that requires physical or significant cognitive or emotional interaction. She will be under such limitations for at least 3-6 months.

Please feel free to contact me with any questions.

Lauren F. Schwartz, MD

Lauren Schwartz, MD, FAANS, FACS
Adult and Pediatric Neurosurgery
West Palm Beach, FL

Castl 0079

Neurological Surgery of Palm Beach

TO WHOM IT MAY CONCERN:

Please refer to my prior letter from November 23, 2019 concerning Ms. Tracy Hurst-Castle. Ms. Hurst-Castle is still under my care for continued neurosurgical disease. The patient is still not advised to participate in any matter that requires physical or significant cognitive or emotional investment due to her neurosurgical illness. It was previously noted that this limitation would be for 3-6 months and she will need the full 6 months at this point in terms of her healing.

Please call with any questions.

Lauren Schwartz, MD

Lauren Schwartz, MD, FAANS, FACS
Adult and Pediatric Neurosurgery
West Palm Beach, FL

Neurological Surgery of Palm Beach

1411 N. Flagler Dr. Suite #7600

West Palm Beach, FL 33401

Phone: (561) 220-8226

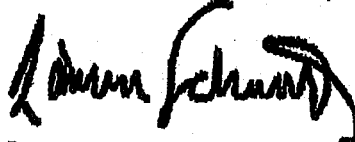
Fax: (561) 335-1257

March 13, 2020

TO WHOM IT MAY CONCERN,

Ms. Tracy Hurst is under my care after being admitted on an emergency basis to my hospital and undergoing emergent surgery which appears to be related to a prior surgical procedure. Ms. Hurst has been under my care for ongoing neurological disease following her surgery. Due to the complexity of her disease and complications that have arisen, she is not able to participate in any matter that requires physical or significant cognitive or emotional interaction. Ms. Hurst requires a necessary follow-up surgery due to her complications that will take place in early April. She will be under such limitations for 6 weeks after being discharged from the hospital.

Feel free to contact me with any further questions.

 M.D.

Lauren Schwartz, MD, FAANS, FACS
Adult and Pediatric Neurosurgery
West Palm Beach, FL

RE: Tracy Hurst-Castle

General Neurological Surgery of Palm Beach <general@neurologicalsurgeryofpalmbeach.com>
Wed 2/19/2020 12:22 PM

To: tcmlawyer@gmail.com <tcmlawyer@gmail.com>

Cc: tlhangel@hotmail.com <tlhangel@hotmail.com>

1 attachments (13 KB)

TH Letter to Lawyer.docx

Please see attached.
Dr. Schwartz

Dr. Lauren Schwartz
Neurological Surgery of Palm Beach
13005 Southern Blvd.
STE 141
Loxahatchee, FL 33470
(561)220-8226

May 5, 2022

RE: Tracy L. Hurst (DOB: 10/18/1960)

To Whom This May Concern:

Ms. Hurst has been under my continual neurosurgical care since her most recent of four cranial procedures 11/15/19 to present, related to the initial surgery for resection of a brain tumor. Ms. Hurst requires additional corrective surgery for treatment of a resistant post-operative wound infection. This forthcoming surgery is the final part of the treatment strategy to address this serious infection at the surgical site which has caused tissue loss and osseous deformity. Ms. Hurst was treated by our craniofacial team in West Palm Beach, where we laid the groundwork for the next stage of surgery for her hopeful complete functional recovery.

Due to travel restrictions from the pandemic along with the patient's medical insurance limitations, she is unable to come to West Palm Beach for further treatment. Progress was also delayed locally due to surgery scheduling limitations caused by the unforeseen pandemic, and at this time she is in the preparative stage for her next surgery.

In addition to Ms. Hurst's extreme emotional duress from her condition and in facing this next stage of surgery for skull and craniofacial reconstruction, she also requires medication that I do not feel will make her a reliable witness or allow her to fully participate in a reasonable capacity for any legal or even mildly complex business interactions. Based on the current surgical plan and schedule, I would anticipate her condition will be limited to the next (3) months. At that time she should then be able to proceed with full mental and emotional capacity, barring any unforeseeable complications.

Feel free to contact me should there be any additional questions.

Lauren Schwartz, MD, FAANS, FACS
Adult and Pediatric Neurosurgery
West Palm Beach, Florida

**DR. ARTHUR
DESROSIERS**

To Whom It May Concern:

August 24, 2020

I am a fellowship-trained craniofacial reconstructive surgeon who operated on Ms. Hurst in November 2019 (in combination with a neurosurgeon, Dr. Lauren Schwartz). Ms. Hurst has been compliant with the post-operative logistical planning for a second stage procedure; it should be noted that she was on the operative schedule for the planned staged reconstructive procedure in early 2020.

However, Ms. Hurst's reconstruction has been not yet taken place due to:

- COVID-19 shutdowns and restrictions;
- Scheduled outpatient surgery was restricted by the Governor of Florida;
- Subsequently, the patient was booked for surgery in June 2020;
- The health status of the patient in view of the COVID-19 pandemic; and
- Ophthalmology did not clear the patient for the June surgery due to what I understand to be a potential severe vision problem.

At this juncture, it is my understanding that Ms. Hurst is now cleared by ophthalmology for surgery. However, the COVID-19 pandemic is still a present issue.

The foregoing is further complicated by the fact that the patient's insurance company failed to authorize continuity-of-care for our office citing that we are an out-of-state and out-of-network provider.

Our office, in collaboration with Ms. Hurst's neurosurgeon in South Florida, Dr. Lauren Schwartz, have worked with the patient to help identify California-based physicians that her insurance plan will cover on an in-network basis. Ms. Hurst has made good faith efforts to schedule and obtain consultations with three different local surgical specialty teams. However, there was not sufficient alignment between the solutions offered by the surgical teams and the (reasonable) patient goals and objectives.

Given the fact that transcontinental travel is problematic in view of COVID-19, the fact that the insurance company has failed to grant our office continuity-of-care authorization to perform the surgery citing out-of-state and out-of-network status, and the patient's good faith efforts to have multiple consultations with other in-network surgical teams, I believe that it is medically necessary and clinically indicated for the patient to see Dr. Rohit Khosla at Stanford. It is our understanding that while Dr. Khosla is in-state (which appears to be a criterion for the patient's health insurance plan), Stanford does require a special approval by the patient's insurance company to authorize care. It is my professional opinion that the patient's insurance company should authorize care with Dr. Khosla. The professional stature of Dr. Khosla is beyond dispute; furthermore, I can personally attest to his surgical skill and ability. As you are aware, he is the Chief of Craniofacial Plastic Surgery at Stanford and more than qualified to treat Ms. Hurst's intricate clinical situation. In my professional opinion, this complicated wound should only be addressed by a fellowship trained craniofacial plastic surgeon. Further, the patient has made good faith efforts to seek traditional in-state, in-network care, and has been unable to identify a suitable provider. For at least the stated reasons, the insurance company should authorize care by Dr. Khosla.

Please do not hesitate to contact me if you have any questions.

Best Regards,



Arthur Desrosiers III MD

DR. RICHARD TEH



Patient Name : Thany Huet

Medical Group at Sun City
2448 Professional Court Ste #110
Las Vegas, NV 89128
ph: (702) 240-8165 fax: (702) 240-8161

Sex : Female

DOB : .



Age : 58

80/20/2020

To Whom It May Concern:

This is to certify that Ms Huet is under my care and she is severely immune compromised, she has life threatening illness and has been seeking medical consultation with different doctors. She is medically unable to attend nor participate in any court proceeding until the end of this year for reasons stated.

Sincerely,


Richard Teh M.D.

**DR. KATRINA HARRIS,
PhD. CPC-INTERN**

December 1, 2022

Byron Thomas
Attorney At Law

Mr. Thomas,

I'm writing this letter on behalf of Tracy Hurst-Castl. As her therapist I am recommending that Ms. Castl consult with a psychologist for an in-depth psychological assessment to determine if she can participate in a trial. I am unable to complete this assessment as it is beyond my scope of practice. I will continue to assist her with all matters related to her mental health.

If you have any questions or concerns, please feel free to contact me.

Sincerely,



Katrina Harris, Ph.D., CPC-Intern

EXHIBIT "C"

Emails

Payment paid in full today:)

TRACY HURST <tlhangel@hotmail.com>

Mon 4/20/2020 3:46 PM

To: kristina@veldlaw.com <kristina@veldlaw.com>

Cc: Lisa Rasmussen <Lisa@veldlaw.com>

Hi Kristine,

Johnnie informed me that he came in and paid you the full amount I promised. I'm so thankful he took care of my obligation to you. I'm big on keeping my word and he knows this. Although I have been disheartened by "family" I'm grateful he was able to make sure you were paid. Big relief for me.

He told me that you had some vandalism at your office, I'm sorry that sucks. I hope nobody got hurt.

Stay safe and well...this all shall pass, I pray so very soon as many are suffering!

Thank you again for yours and Lisa's help and concern for my wellbeing. Like I said prior I will never forget your kindness. True human Angel.

Sincerely,

Tracy

Sent from my iPhone

Castl v. PennyMac

Lisa Rasmussen <Lisa@veldlaw.com>

Tue 5/5/2020 8:56 AM

To: TRACY HURST <tlhangel@hotmail.com>; kristina@veldlaw.com
<kristina@veldlaw.com>; jessica@veldlaw.com <jessica@veldlaw.com>; michelle@veldlaw.com
<michelle@veldlaw.com>

Good morning folks:

New Trial Date is September 8, 2020.
Calendar Call is 8/19/20 at 8:30 a.m.

Pretrial Submissions due May 26, 2020 (to PennyMac)
Pretrial memorandum to be submitted on or before August 19, 2020 (to chambers)

If there is a medical issue that causes us to not be able to comply with the September 8th trial date, we must file something 60 days in Advance, which would be by July 8th.

Judge Johnson would like to see Tracy pursue local options for the follow up surgery, he does not know why she needs to travel to Florida. Just passing along what he said.

So, we can breathe for a moment.

Lisa

Lisa Rasmussen, Esq.
Law Offices of Kristina Wildeveld & Associates
550 E. Charleston Blvd.
Las Vegas, NV 89101
T. (702) 222-0007 | F. (702) 222-0001
www.veldlaw.com

Sent from Mail for Windows 10

EXHIBIT "D"

90 Day Notices sent Certified Mail

Cedar Sinai Surgeon's

and

Sedgwick

Medical Malpractice Correspondence

Ms. Kate LoCurto, Sr. Professional Claims Specialist

90 Day Notice Letters

jessica@veldlaw.com <jessica@veldlaw.com>

Mon 5/4/2020 3:49 PM

To: tlhangel@hotmail.com <tlhangel@hotmail.com>

Good Afternoon,

Per our phone conversation, attached please find the 90-Day Notice letters for your signature. Please sign and return to our office so that they can be sent certified mail today.

Sincerely,

Jessica Malone

Legal Assistant

THE LAW OFFICES OF KRISTINA WILDEVELD & ASSOCIATES

550 E. Charleston Blvd.

Suite -A-

Las Vegas, NV 89104

Phone (702) 222-0007

Fax (702) 222-0001

www.veldlaw.com

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May 4, 2020

SENT VIA CERTIFIED MAIL

Dr. Keith Black, M.D.
Neurosurgeon
Cedars Sinai
127 S. San Vicente Blvd.
#A6600
Los Angeles, CA 90048

Re: *Potential Medical Malpractice Claim of Tracy L. Hurst*

Dear Dr. Black,

You are hereby notified, pursuant to section 364 of the California Code of Civil Procedure, that within ninety (90) or more days from the date of this notice, the above-named individual intends to commence action against you as a defendant. This action will be based on your negligent surgical intervention and/or your failure to timely and/or properly address post-operative complications resulting from your surgical intervention and/or your failure to provide proper post surgical care. As a result of your negligence, I have suffered injury and damage including, but not limited to, the removal of skull flap, leakage of brain tissue and fluid, severe infection, and cognitive neurological damage, which was diagnosed on or after November 14, 2019.

Detriment and loss sustained by Tracy Hurst include:

- a) Past and future medical and related expenses in a sum not yet fully ascertained
- b) Past and future loss of earnings and future earning capacity in a sum not yet fully ascertained; and
- c) Physical and emotional pain and suffering.

If you or your insurance carrier require additional information concerning this matter or wish to discuss it in greater detail, please direct all further inquiries to the undersigned.

Sincerely,

Tracy Hurst-Castl
28128 Pacific Coast Highway, #150
Malibu, CA 90265
cc: P.O. Box 35937
Las Vegas, NV 89133

May 4, 2020

SENT VIA CERTIFIED MAIL

Dr. Ray Chu, M.D.
Neurosurgeon
Cedars Sinai
127 S. San Vicente Blvd.
#A6600
Los Angeles, CA 90048

Re: *Potential Medical Malpractice Claim of Tracy L. Hurst*

Dear Dr. Chu,

You are hereby notified, pursuant to section 364 of the California Code of Civil Procedure, that within ninety (90) or more days from the date of this notice, the above-named individual intends to commence action against you as a defendant. This action will be based on your negligent surgical intervention and/or your failure to timely and/or properly address post-operative complications resulting from your surgical intervention and/or your failure to provide proper post surgical care. As a result of your negligence, I have suffered injury and damage including, but not limited to, the removal of skull flap, leakage of brain tissue and fluid, severe infection, and cognitive neurological damage, which was diagnosed on or after November 14, 2019.

Detriment and loss sustained by Tracy Hurst include:

- a) Past and future medical and related expenses in a sum not yet fully ascertained
- b) Past and future loss of earnings and future earning capacity in a sum not yet fully ascertained; and
- c) Physical and emotional pain and suffering.

If you or your insurance carrier require additional information concerning this matter or wish to discuss it in greater detail, please direct all further inquiries to the undersigned.

Sincerely,

Tracy Hurst-Castl
28128 Pacific Coast Highway, #150
Malibu, CA 90265
cc: P.O. Box 35937
Las Vegas, NV 89133

May 4, 2020

SENT VIA CERTIFIED MAIL

Suzane Brian, PA
Cedars Sinai
8700 Beverly Blvd
West Hollywood, California 90048

Re: *Potential Medical Malpractice Claim of Tracy L. Hurst*

Dear Ms. Brian,

You are hereby notified, pursuant to section 364 of the California Code of Civil Procedure, that within ninety (90) or more days from the date of this notice, the above-named individual intends to commence action against you as a defendant. This action will be based on your negligent failure to timely and/or properly alert the proper parties of post-operative complications resulting from surgical intervention facilitated by neurosurgeons you assist. As a result of your negligence, I have suffered injury and damage including, but not limited to, the removal of skull flap, leakage of brain tissue and fluid, severe infection, and cognitive neurological damage, which was diagnosed on or after November 14, 2019.

Detriment and loss sustained by Tracy Hurst include:

- a) Past and future medical and related expenses in a sum not yet fully ascertained
- b) Past and future loss of earnings and future earning capacity in a sum not yet fully ascertained; and
- c) Physical and emotional pain and suffering.

If you or your insurance carrier require additional information concerning this matter or wish to discuss it in greater detail, please direct all further inquiries to the undersigned.

Sincerely,

Tracy Hurst-Castl
28128 Pacific Coast Highway, #150
Malibu, CA 90265
cc: P.O. Box 35937
Las Vegas, NV 89133

May 4, 2020

SENT VIA CERTIFIED MAIL

Dr. Randolph Sherman, M.D.
Reconstructive/Plastic Surgeon
Cedars Sinai
8635 W Third St #770W
Los Angeles, CA 90048

Re: *Potential Medical Malpractice Claim of Tracy L. Hurst*

Dear Dr. Randolph,

You are hereby notified, pursuant to section 364 of the California Code of Civil Procedure, that within ninety (90) or more days from the date of this notice, the above-named individual intends to commence action against you as a defendant. This action will be based on your negligent post-surgical reconstruction and failure to properly diagnose post-surgical infection. As a result of your negligence, I have suffered injury and damage including, but not limited to, the removal of skull flap, leakage of brain tissue and fluid, severe infection, and cognitive neurological damage, which was diagnosed on or after November 14, 2016.

Detriment and loss sustained by Tracy Hurst include:

- a) Past and future medical and related expenses in a sum not yet fully ascertained
- b) Past and future loss of earnings and future earning capacity in a sum not yet fully ascertained; and
- c) Physical and emotional pain and suffering.

If you or your insurance carrier require additional information concerning this matter or wish to discuss it in greater detail, please direct all further inquiries to the undersigned.

Sincerely,

Tracy Hurst-Castl
28128 Pacific Coast Highway, #150
Malibu, CA 90265
cc: P.O. Box 35937
Las Vegas, NV 89133

May 4, 2020

SENT VIA CERTIFIED MAIL

Dr. Richard Sokolov, M.D.
IM/Infectious Diseases
Cedars Sinai
5901 W Olympic Blvd
Ste 201
Los Angeles, CA 90036

Re: *Potential Medical Malpractice Claim of Tracy L. Hurst*

Dear Dr. Sokolov,

You are hereby notified, pursuant to section 364 of the California Code of Civil Procedure, that within ninety (90) or more days from the date of this notice, the above-named individual intends to commence action against you as a defendant. This action will be based on your negligent failure to properly diagnose post-surgical infection. As a result of your negligence, I have suffered injury and damage including, but not limited to, the removal of skull flap, leakage of brain tissue and fluid, severe infection, and cognitive neurological damage, which was diagnosed on or after November 14, 2019.

Detriment and loss sustained by Tracy Hurst include:

- a) Past and future medical and related expenses in a sum not yet fully ascertained
- b) Past and future loss of earnings and future earning capacity in a sum not yet fully ascertained; and
- c) Physical and emotional pain and suffering.

If you or your insurance carrier require additional information concerning this matter or wish to discuss it in greater detail, please direct all further inquiries to the undersigned.

Sincerely,

Tracy Hurst-Castl
28128 Pacific Coast Highway, #150
Malibu, CA 90265
cc: P.O. Box 35937
Las Vegas, NV 89133

Re: Malpractice Correspondence

Lisa Rasmussen <lisa@veldlaw.com>

Tue 5/26/2020 10:51 AM

To: TRACY HURST <tthangel@hotmail.com>

Ok. I'll have to figure out how Ken recommends we respond.

Lisa

Get Outlook for iOS

On Tue, May 26, 2020 at 9:58 AM -0700, "TRACY HURST" <tthangel@hotmail.com> wrote:

Hi Lisa,

Hope your weekend was peaceful:)

FYI-I received this letter in the mail Re: Dr. Black & Dr Sherman response to the letter.